

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

**IN THE MATTER OF SEARCH
WARRANTS FOR 21 LOCATIONS**

MISC. NUMBERS:

*13-1630 TJS Through
13-1650 TJS*

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AFFIDAVIT IN SUPPORT OF APPLICATIONS FOR SEARCH WARRANTS

This affidavit is submitted in support of an application for search warrants for 21 locations. These locations to be searched are the residences, and businesses of individuals who are active members of a racketeering enterprise committing violations of controlled substance laws in and around the Baltimore Metropolitan area, and committing armed home invasions, residential burglaries, and commercial burglaries at convenience stores, gas stations, financial institutions, restaurants, liquor stores, and other commercial businesses. They have committed and continue to commit these crimes throughout Maryland, Virginia, West Virginia, Pennsylvania, Delaware, the District of Columbia and elsewhere. This group has been and will continue to be engaged on a daily basis with distribution of significant amounts of diverted pharmaceuticals to include Oxycodone, percocet, methadone, suboxin, buprenorphine, steroids, and other prescription and controlled substances to include heroin and cocaine. For reasons presented in detail below, your affiant believes that members of this conspiracy keep and conceal in these locations to be searched, documents, records, drugs, stolen goods, and other evidence revealing the scope of the conspiracy, the identity of members, their methods of operation to include the laundering of proceeds from both drug trafficking and from the robberies and burglaries.

This Affidavit first sets forth your affiant's background, training, expertise, and knowledge. (Part I). This Affidavit then describes the investigation to date summarizing information derived from multiple confidential sources, fixed and mobile physical surveillances, seizures of drugs, analysis of incident reports, public documents, and intercepted telephone calls. (Part II). This Affidavit then identifies each of the locations to be search. For each location, this Affidavit sets forth (a) a physical description of the location; (b) the identity of the individual(s) who lives or works (or frequents) at the specified location; (c) the evidence that they currently live/work at that location; (d) the evidence of that individual's participation in this criminal enterprise; and (e) evidence that supports a search of the location in question. (Part III). At the very end of the document are the attachments that indicate the specific evidence being sought at each location.

AFFIDAVIT IN SUPPORT OF APPLICATION FOR SEARCH WARRANTS

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I. AFFIANT'S EXPERTISE AND KNOWLEDGE

Your affiant, Glenn J. Hester, a Detective with the Baltimore Police Department (BPD), and a Task Force Officer with the Drug Enforcement Administration ("DEA"), being duly sworn, deposes and states as follows:

1. I am an "investigative or law enforcement officer ... of the United States" within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

2. I am a detective police officer with the BPD and have been so employed since February 1986. I have been deputized as a task force officer with the Drug Enforcement Administration (DEA) for approximately eight years. I am currently assigned to the DEA's Tactical Diversion Squad, which investigates crimes involving the distribution of pharmaceutical controlled substances and prescription medications in Baltimore City and surrounding counties. I have received over 140 hours of specialized training for narcotics and pharmaceutical controlled substances. I have testified as an expert witness in relation to illegal narcotics and pharmaceutical controlled substances.

3. As a Baltimore Police Detective and DEA task force officer, I have participated in numerous investigations of unlawful drug distribution involving the use of confidential informants, undercover operations, physical and electronic surveillance, telephone toll analysis, investigative interviews, the execution of search warrants, and the recovery of substantial quantities of narcotics, pharmaceutical controlled substances, proceeds, and related paraphernalia. I have reviewed taped conversations, as well as documents and other records relating to controlled substance trafficking and money laundering. I have interviewed persons

familiar with the drug business to include drug dealers, users and confidential informants and have discussed with them the lifestyles, drug appearance terminologies and habits. Through training, knowledge and experience, I have become familiar with the manner in which illegal drugs are transported, stored, and distributed, the possession and use of firearms in connection with the trafficking of such drugs, and the methods by which CDS traffickers collect, and conceal the proceeds of their illegal activities. I have also become familiar with the manner in which traffickers use telephones, cellular telephone technology, pagers, coded communications or slang-filled telephone conversations, false or fictitious identities, text messaging, Direct Connect/Dispatch Services and other means to facilitate their illegal activities and hamper law enforcement investigations.

4. I respectfully submit that there is probable cause to believe the persons described herein are committing and conspiring to commit violations of federal and state narcotics laws (21 U.S.C. § 841 *et seq*). Moreover, these persons described herein, and others, are participating and conspiring to participate in a racketeering enterprise, 18 U.S.C. § 1962(d), to include violations of 18 U.S.C. § 922(g) (Prohibited persons possessing firearms); 18 U.S.C. § 1956, *et seq* (laundering monetary instruments); 18 U.S.C. § 1959 (Violent crimes in aid of racketeering activity); 18 U.S.C. § 2113 (Bank Larceny); 18 U.S.C. § 2314 (Interstate Transportation of Stolen Goods); 18 U.S.C. § 1952 (Interstate transportation in aid of racketeering enterprises) and other enumerated crimes in 18 U.S.C. § 1961.

5. The instant investigation is being conducted by the Drug Enforcement Administration ("DEA"), Howard County Police Department ("HCPD"), Baltimore County Police Department ("BCPD"), Alcohol, Tobacco and Firearms ("ATF"), Health and Human Services-Office of Inspector General ("HHS-OIG") and Coast Guard Investigative Service ("CGIS"), and the

Baltimore Police Department ("BPD"). Your affiant has also collected and reviewed incident reports and investigative files from no less than a dozen local police agencies from jurisdictions throughout the mid-Atlantic region. Detectives specializing in robbery and burglary from Baltimore County, Baltimore City, Howard County and Anne Arundel County have also worked closely with your affiant in analyzing collected evidence. I make this affidavit based upon personal participation in this investigation, reports made to me by, and information learned from other law enforcement agents, as well as the confidential informants discussed in more detail below. Except where otherwise noted, the information set forth in this affidavit has been provided to me by other law enforcement officers who have assisted in the investigation. Unless otherwise noted, wherever in this affidavit asserts that a statement was made, the statement was made by another law enforcement officer (any of whom may have had either direct or hearsay knowledge of that statement) to whom I or other law enforcement officers have spoken or whose reports I have reviewed. Such statements are reported in substance and in part, unless otherwise indicated. Likewise, information resulting from surveillance sets forth either my personal observations or information provided directly or indirectly through other law enforcement personnel who conducted such surveillance.

6. Your affiant has gained extensive experience in the present investigation, being the case agent involved with nearly all aspects of this case and investigative tasks including, but not limited to, reviewing the electronic intercepts since, April, 2013. Based upon my training, knowledge and experience and my participation in this investigation, as well as my conversations with other agents, task force officers and detectives, your affiant knows that persons involved in violations of state and federal narcotics laws and other racketeering violations keep and maintain evidence, fruits, and/or instrumentalities of these crimes in their

homes, cars, businesses and in the homes, cars and businesses of friends, family, and co-conspirators. This evidence includes financial records (bank records, investment records, charge card records, records of income and expenditures, and computer records, etc.), drugs, related paraphernalia, tally sheets, contact lists, customer lists, price lists, names and addresses of persons who have and can assist and facilitate in disposing of proceeds from robberies and burglaries to include pawn shops, fences and others. Individuals engage in money laundering to spend or invest the illegal income in such a way that they can later show certain financial records to explain their acquisition of assets and their lifestyle, and make it appear that they have not had access to the illegal income. To do so, they must keep selected records of at least some of those transactions. Therefore, I have reason to believe that:

- a. Those involved in such illegal activities and their associates often place assets in names other than their own to avoid detection of these assets by government and law enforcement agencies. Even though assets are placed in the names of other persons or entities, those involved in such illegal activities and their associates actually own them.
- b. It is common for those involved in such illegal activities and their associates to maintain in their residence and/or business establishments computerized or written books, records, receipts, diaries, notes, ledgers, airline tickets, cashier's checks, money orders, and other papers relating to the illegal activities and the assets derived from the proceeds of such illegal activities.
- c. Those involved in such illegal activities and their associates often accrue debts to or from their associates, and must therefore keep records of these transactions readily available to settle debts to or from their associates.
- d. Those involved in such illegal activities and their associates commonly conceal proceeds of illegal transactions, records of these transactions, and records reflecting names, nicknames, addresses, and telephone numbers of criminal associates within their residence and/or place of business, their business vehicles, or the curtilage of their residence or business for ready access and to hide them from law enforcement agencies. Those involved in such illegal activities and their associates will often conceal these things within the homes of their family members.
- e. Those involved in such illegal activities and their associates commonly maintain records reflecting names, nicknames, addresses, and telephone numbers of both their

current and past associates. Those involved in such illegal activities and their associates who are aware of an ongoing criminal investigation into their illegal activities will usually alter their operational methods in order to hinder law enforcement agencies from detecting their unlawful activities. They will often destroy an existing format of records reflecting their illegal transactions (i.e., names of associates to whom they have given money and amounts of money possibly owed and/or collected). However, it is common for them to create another type of record after destroying one type of record to assist in the collection of debts.

f. Those involved in such illegal activities and their associates will often establish a business and use it to facilitate illegal activities, the laundering of illegal proceeds, and the collection of illegal debts. Business locations are frequently used to store records and/or receipts reflecting the collection of illegal debts and the expenditure of illegal proceeds for personal and/or business assets.

g. Those involved in such illegal activities and their associates will commonly conceal within their vehicles, residence, or businesses, or within the curtilage of their residence or businesses, financial instruments, precious metals, precious gemstones, jewelry, electronic equipment, stolen goods, cash, and other items of value and/or proceeds of illegal transactions and evidence of financial transactions relating to obtaining, transferring, secreting, or spending money made in illegal activities. Those involved in such illegal activities and their associates will often conceal these things within the homes of their family members.

h. Those involved in such illegal activities and their associates will attempt to legitimize the profits from illegal transactions by using domestic banks and their attendant services (i.e., safe deposit boxes, letters of credit, brokerage houses, real estate, shell corporations, and business fronts).

i. Those involved in such illegal activities and their associates who are aware of a criminal investigation into their financial activities will conceal, liquidate, and transfer easily movable illegally-derived assets in order to prevent law enforcement agencies from seizing and forfeiting these assets.

j. Those involved in such illegal activities and their associates often keep photographs or video movies of themselves, their co-conspirators, and the property and assets purchased with illegal proceeds at their residence and/or place of business.

k. The vehicles, residence or business locations of those involved in such illegal activities and their associates will often contain records of travel related to or financed by the illegal activities, these records may include airline tickets, credit card receipts, rental car receipts, gasoline purchase receipts, toll information, and other indicia reflecting travel.

l. Courts have recognized that an unexplained increase in wealth is probative evidence of crimes motivated by greed; all financial records of a suspect of such crimes are relevant to an analysis of the suspect's assets, income, and expenditures at various time periods, and to the money laundering of illegal income. The principal purpose of money laundering is to

acquire ostensibly legitimate assets and wealth, for which the individual can produce records which appear to show that the wealth is legitimate. Any such records of ostensibly legitimate assets and income are likely to contain evidence of the money laundering, especially discrepancies between income, expenses, and growth in assets. Financial statements and loan applications often are more accurate than a criminal's filed income tax returns.

m. Subjects involved in pharmaceutical diversion related violations sometimes steal prescription pads from physician's offices forge physician's signatures on them and use them to obtain prescriptions for controlled dangerous substances; sometimes call pharmacies posing as health care workers illegally prescribing controlled drugs for themselves and fictitious patients; sometimes feign ailments in order to obtain prescriptions for controlled dangerous substances from physicians; sometimes purposely see a number of physicians on a regular basis for the same alleged ailments, purposely concealing the fact that they are being treated by other physicians for the same ailments and that they are obtaining the same controlled dangerous substance from each; sometimes generate prescriptions forms through the use of a computer and printer. In addition they keep records of transactions and associates through the use of notebooks, computers, and other electronic organizers; sometimes use computers to order controlled dangerous substances and prescription medications over the Internet. By doing this they attempt to circumvent the United States Customs Service, physicians and pharmacies by having the controlled dangerous substances delivered to their homes, offices, or post office boxes; sometimes steal controlled dangerous substances or prescriptions from their place of employment. They will either secrete these drugs on or about their person or ingest these drugs while working; sometimes go to doctors who will write prescriptions for controlled dangerous substances and other prescription medications when there is no legitimate underlying medical problem.

n. Subjects involved in pharmaceutical diversion related violations maintain documents including ledgers, telephone number lists, telephone records, receipts, financial notations, medical records, physician and pharmaceutical information. These records are organizationally necessary to avoid suspicion by physicians, pharmacists and law enforcement officials. These records are commonly maintained within the residence and/or vehicle for easy access.

o. Subjects involved in pharmaceutical diversion related violations often carry quantities of the controlled drugs obtained on their person for easy access. These drugs are easily concealed on or about their person and can be passed from person to person.

p. Subjects involved in property crimes such as burglaries and robberies will store masks, gloves, weapons, cables, tools, saws, drills, grinders, as well as the profits obtained through these activities in their homes, cars, businesses, sheds, and any other location where they are safe from detection.

7. Because this Affidavit is being submitted for the limited purpose of establishing probable cause for a warrant to search the identified premises for evidence of narcotics

trafficking, interstate transportation of stolen goods, bank larceny, and other crimes, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause. I have not, however, excluded any information known to me that would defeat a determination of probable cause.

II. STATEMENT OF FACTS AND CIRCUMSTANCES

A. Introduction.

8. As a result of my personal participation in the investigation and my review of the information detailed below, your affiant states that there is a racketeering enterprise involved in drug trafficking and other illegal activities, to include armed home invasion robberies and commercial burglaries. This investigation, which began late summer of 2012, has gathered evidence through the use of confidential sources of information, controlled purchases of drugs, fixed and mobile surveillance, public document checks, cell-site precision analysis (ping) information, video surveillance, dialed number recorders (DNR), telephone tolls, and court authorized electronic surveillance. As more fully described herein, the core members of this criminal enterprise include David Paschall, Jr.; Mary Estes Paschall; Chad Paschall; Carl Paschall, Sr.; Carl Paschall, Jr.; Michael Paschall; Tina Woodland; Jackie Weatherley, Jr.; Michael Terry; Richard Braitsch; William Matheny; Mark Johnson; Richard Ashbrook; Michael Johnson; Thomas Ellis; Kenneth Smith; Ronald Henderson; James Hedges; Sidney Tawes; Joseph Delawder; Terry Currier; William Metcalf; and others. Several members of this group are blood relations making this group historically harder to infiltrate.¹ In addition to all of the evidence gathered, your affiant obtained Court authorization during April and May of 2013, to intercept, monitor and record conversations on telephones used by targets David Paschall, Jr. (hereinafter "David Paschall"), and Jackie Weatherley, Jr. (hereinafter Jackie Weatherley.)

¹ David Pachall, Jr., Carl Pachall, Sr., and Tina Woodland are siblings. David Paschall is married to Mary Paschall. David Paschall has several sons, two of which are Michael Paschall and Chad Paschall. Carl Paschall, Sr., has a son, Carl Paschall, Jr.

9. A brief synopsis of the role of each of the members of this criminal enterprise is as follows:

a. David Paschall operates Paschall's Auto Body and Fender ("Paschall's Auto"), located at **801 Desoto Road, Baltimore, Maryland 21223, location #1**. This location is central to the drug distribution and other criminal activities described herein. David Paschall, is at the location daily, and often sleeps the night there. David Paschall is a drug user. Through the current investigation, law enforcement has determined that David Paschall, both purchases and distributes controlled substances. He has street level drug connections that provide quantities of Oxycodone and other controlled substances at discount prices to him. Paschall then sells the drugs at a higher price for profit while obtaining doses for himself. David Paschall operates this drug business with the daily assistance of his wife Mary Estes Paschall, and his son Chad Eric Paschall. Customers come to the auto shop location on a daily basis to purchase Oxycodone and other pharmaceuticals and controlled substances from David Paschall. Suppliers also deliver drugs to David Paschall at this location as well. Within the same enclosed parking area are two businesses also used to facilitate the criminal activity herein: Patriot Fire Stop, 8 [REDACTED] **Desoto Road, Baltimore, Maryland, location #2** - owned and operated by Joseph Delawder; and Supreme Auto Glass, 8 [REDACTED] **Desoto Road, Baltimore, Maryland, location #3** - owned and operated by William Matheny.

b. Over wiretap intercepts, your affiant has determined that Jackie Weatherley, Jr., Richard Braitsch, William Matheny, James Hedges, Michael Terry, and others, supply David Paschall, with amounts of illegal drugs for resale on a regular basis. Sidney Tawes has been identified as a quantity customer, someone who purchases distribution amounts for resale. Joseph Delawder purchases personal use amounts on a regular basis and helps with the

Pashcall's distribution strategy. Terry Currier obtains drugs from David Paschall and smuggles them into the Jessup, Maryland, jail to Richard Brooks, an associate and past member of this enterprise currently serving ten years in the Maryland Division of Correction for burglary.

c. Members of this enterprise also commit commercial burglaries which include, crossing state lines with stolen goods, and destroying automated teller machines (ATMs); home invasion robberies which include violent acts and the use of firearms; arson; and other violations of federal and state laws. Those targets committing these acts, or aiding and abetting these acts, include David Paschall, Mary Paschall, Chad Paschall, Cara Severe, Jackie Weatherley, Carl Paschall, Sr., Carl Paschall, Jr., Michael Paschall, Mark Johnson, Ronald Henderson, Richard Ashbrook, Michael Johnson, Thomas Ellis, Kenneth Smith, William Metcalf and Tina Woodland.

B. Early Investigation and Confidential Sources of Information.

10. Information was gathered from almost a dozen confidential sources of information. (CS) Without exception, each source expressed safety concerns - for themselves and their families - because of the violent nature of the persons about whom they were speaking. These sources are summarized below:

a. CS1, registered with law enforcement, has known David Paschall for several years. Under the direction and supervision of law enforcement, CS1 has made at least a half dozen controlled purchases of Alprazolam (Schedule IV) and Oxycodone (Schedule II) paying at least \$2,500, between September of 2012, and March 2013 from David Paschall. All of these purchases occurred at Paschall's Auto, located at 8 ■■■ Desoto Road, Baltimore, Maryland 21223, location #1. CS1 reported that there are security cameras on the perimeter of the property and surveillance monitors throughout Paschall's Auto so that persons inside can

know if and when others are approaching. During one of the purchases, CS1 reported that Michael Paschall was present at the shop and was armed with a semi-automatic firearm. During another purchase, CS1 reported that Chad Paschall was present at the shop and was armed as well.

b. CS2 is registered with law enforcement, and in the fall of 2012 advised that David Paschall was purchasing quantities of prescription medication from various persons in the Baltimore area. CS2 further advised that during the summer of 2012, he/she escorted an individual to Paschall's Auto, 8 ■■■ DeSoto Road, Baltimore, Maryland, location #1, who possessed a quantity of Oxycodone to sell to David Paschall. CS2 advised that on that occasion, David Paschall purchased 90 tablets of Oxycodone for \$900. CS2 reported that he/she has taken individuals to Paschall's Auto on approximately four occasions for the purpose of selling Oxycodone to David Paschall, for resale.

c. CS3 is a person who is familiar with the methods used by those persons involved in the illegal sales of Oxycodone, such as, obtaining Oxycodone with forged and fraudulent prescriptions, utilizing "runners" to present the forged prescriptions at pharmacies, and finally, utilizing street personnel to distribute the Oxycodone for profit. CS3 was providing information pursuant to a cooperation agreement, hoping for a reduced sentence. In August 2012, CS3 reported that during approximately 2009 and/or 2010, he/she sold Oxycodone pills to several persons in the Baltimore area, to include David Paschall, and his son, Michael Paschall.

d. CS4, a concerned citizen, reported purchasing quantities of marijuana from Michael Paschall on approximately four occasions, most recently in early 2012. At that time, Michael Paschall asked CS4 if they knew anyone interested in purchasing cocaine or prescription medications. Earlier, in October or November 2011, CS4 observed Michael

Paschall snorting a white powdery substance, believed to be cocaine, while at work.

e. CS5, a concerned citizen, reported in late 2012, Michael Paschall was getting quantities of Oxycodone from a New York source early each week. CS5 estimated the amount to be approximately three hundred to four hundred tablets with strengths of 30 and 80 milligram.

f. CS6 is registered with law enforcement. In late January 2013, your affiant met with CS6 who identified Michael Paschall from a photograph provided by investigators. CS6 advised Michael Paschall obtained quantities of Oxycodone 30 milligram tablets regularly from a local source of supply who obtains them in New York.

g. CS7, a concerned citizen, reported in 2009 that Jackie Weatherley, Jr. regularly distributes quantities of oxycontin and percocet (both Sch II) in west Baltimore, Maryland. CS7 advised that Jackie Weatherley, Jr., is a member of Dead Men Incorporated (DMI), which your affiant knows is an exceptionally violent drug group with a loyal following within the correctional facilities. According to CS7, in 2010, Weatherley and his brother, Brian Weatherley, were "doctor shopping," getting prescriptions for scheduled drugs from multiple doctors at the same time. CS7 said that Weatherley's father was also involved in similar activity. According to CS7 they would send persons into pharmacies to illegally fill the prescriptions for them. This is typically for a fee or in return for drugs. During June, 2013, CS7 reported that Jackie Weatherley lives on **Bigley Avenue, Lansdowne, 21227** and that he purchased the adjacent rowhouse next door from an aunt. Your affiants knows from this investigation that Weatherley lives at 3 ■■■ **Bigley Avenue, Lansdowne, Maryland, location #7**, and Robert Koetzle, III, who works at Paschall's Auto, **location #1**, lives at 3 ■■■ **Bigley Avenue**,

right next door to Weatherley.² CS7 also advised that Weatherley's parents lived on 7th Street in Glen Burnie. Your affiant further knows that Weatherley's parents, Karen and Jackie, Sr., live at 10 ■ 7th Street in Glen Burnie, location #8. As of June 2013, CS7 reported this activity continues.

h. CS8 is a person involved in the distribution of diverted pharmaceuticals, who reported in 2009 that a person known as "Jack" distributed quantities of oxycontin and percocet (both Sch II) in Baltimore, Maryland. CS8 was providing information hoping for favorable treatment following an arrest. CS8 positively identified a photograph of Jackie Weatherley, Jr., as the person known as "Jack." CS8 went to the Lexington Market, a location on the westside of downtown Baltimore (which your affiant knows is a location where diverted pharmaceuticals are often sold) on a daily basis and purchased quantities of Oxycontin and Percocet from persons who sell their prescriptions. CS8 reported that after purchasing these large quantities of controlled substances, CS8 would then contact Weatherley and sell these drugs to him for further distribution. CS8 advised that back in 2009, Weatherley was living at an unknown location in Morrell Park, (Southwest Baltimore) but CS8 identified 7th Street, Glen Burnie, Maryland, location #8, as a home of Weatherley's family members. CS8 had been in that home with Weatherley and observed the use of drugs at that location as well. CS8 advised he/she delivered drugs to Weatherley at his parent's house.

i. CS9 is registered with law enforcement and in January of 2013, advised that "Jackie," believed to be Jackie Weatherley, Jr., sells large quantities of Oxycodone. CS9 also reported that Bill Matheny (believed to be William Matheny), "hangs" with the Paschalls and

² Koetzle is the nephew of David Paschall and Carl Paschall, Sr., and is the son of Tina Woodland.

sells large quantities of “thirties” to David Paschall. Your affiant knows this is a street term for 30 milligram strength Oxycodone tablets. A toll analysis of David Paschall’s telephone at that time reflected 29 contacts between late November of 2012 and early March of 2013 with William Matheny. CS9 reported that he/she heard that an individual known as “Charlie” was inside Paschall’s Auto, 8■■■Desoto Road, Baltimore, Maryland, location #1, and noticed several police officers approaching Paschall’s Auto while watching the security monitors inside. According to CS9, Charlie, after noticing the police presence, flushed approximately 300-400 pills, including Oxycodone 30 milligram tablets, down the toilet.

j. CS10 is familiar with the methods used by persons involved in the illegal sales of Oxycodone, same as CS3 described above. CS10 was providing information pursuant to a cooperation agreement, hoping for a reduced sentence. In approximately February 2012, CS10 reported they sold approximately 400-500 tablets of Oxycodone each month to William “McFeeney.” CS10 reported that “McFeeney” lives on Grinnalds Avenue in Morrell Park, Baltimore, Maryland. (Your affiant knows that William *Matheny* lived at 2056 Grinnalds Avenue, Baltimore, Maryland.) CS10 advised that the Oxycodone pills that he/she supplied to “McFeeney” were then sold to Jackie Weatherley, Jr. CS10 also identified Weatherley as a major distributor of Oxycodone pills in the Baltimore area. CS10 said that Weatherley distributes approximately 2,000 Oxycodone pills each month.

C. Evidence of Drug Trafficking.

11. Three months of wiretap evidence, two on David Paschall’s telephone, and one month on Jackie Weatherley, Jr.’s phone, confirmed much of this information provided by informants. A daily snapshot of two months of activity by many of the individuals described herein, is captured in these telephone conversations:

- On April 2, 2013, David Paschall received an incoming call from an unknown male (Ref. 63/182). The male told Paschall, "I wanted, I wanted, when I got them, I was coming to you because I promised that I was going to bring them to you." Paschall replied, "Right, hold on boss, I'm like, busted with some funds right now, let me see if I can find the funds." The male said, "Alright I'm going to take, um, I'm, um, right here, right here at the shop to and I'm, I just came up here to stop and see if you were in here and they said you were on your way back or something." Your affiant believes the male called Paschall to advise him that the male was at the shop, believed to be Paschall's Auto, 8 ■■■ Desoto Road, Baltimore, Maryland 21223, location #1, with a quantity of controlled substances for David Paschall to purchase.
- In the next call, on April 2, 2013, David Paschall made an outgoing call to Jackie Weatherley (Ref. 64/183) and advised Weatherley, "Um, dude got 100 M boxes....3-O." Weatherley advised that he was interested in purchasing the drugs, but Weatherley misplaced the key to his safe. Paschall told Weatherley that "dude" wanted nineteen hundred dollars for the boxes. Weatherley told Paschall that he would be over. Your affiant believes that the unknown male (dude) from the previous call was at Paschall's Auto, location #1, to sell his "M-Boxes," your affiant knows, based on training, knowledge and experience, is a term used to described 30 milligram tablets of Oxycodone.
- On April 3, 2013, David Paschall received an incoming call from an unknown male (Ref. 202/592). The male advised that he had sixty "thirties" for sale at fifteen dollars each. Your affiant knows this to mean sixty 30 milligram tablets of Oxycodone for sale. Paschall advised the male to see "Jackie," believed to be Weatherley. According to various intercepts, it is believed that Jackie Weatherley commonly financed drug deals for Paschall, and Paschall brokered deals for Weatherley.
- On April 3, 2013, David Paschall received an incoming call from Weatherley (Ref. 205/604). Weatherley told Paschall about someone interested in selling controlled substances. Weatherley said, "These are oxycontin 30's dawg. These are the big fat brown OP's." Paschall replied, "No, they ain't the right ones then. Don't fuck with em. No, I thought they were percs." Weatherley urged, "But he's here now. Yeah that's all he's got." Paschall advised that he was on the way there. Your affiant believes the seller was at Paschall's Auto, location #1, with Weatherley who called Paschall to come for the deal. Paschall did not want the "Ops" because, as your affiant knows, they are not in high demand because "OP's" cannot be crushed or ingested for an instant "high."
- On April 11, 2013, David Paschall and William Matheny had two conversations regarding controlled substances (Ref. 799/2504). In the first call, Paschall called Matheny and told him Paschall needed some "threes." Matheny said he will be right over. A short time later, Matheny called Paschall and asked him how many

he needed. Paschall needed four. Later that same date, Paschall received a telephone call from "Kiley." (Ref. 801/2508). "Kiley" asked Paschall if he had any "blinkies." Your affiant knows "threes" and "blinkies" are street terms used to describe 30 milligram tablets of Oxycodone. "Kiley" needed "four." Paschall was then overheard in the background asking, "How many you got Bill?" Based on these conversations, your affiant believes that Matheny delivered the Oxycodone to David Paschall at Paschall's Auto, **location #1**.

- On April 12, 2013, David Paschall received an incoming call from Sidney Tawes (Ref. 842/2660). In that conversation, Paschall told Tawes that he had fifteen "fives." Your affiant knows that "fives" is a street term used to describe five milligram tablets of Oxycodone. Tawes asked Paschall to hold onto the "fives," and she would be down later. Your affiant believes that Tawes would be responding to Paschall's Auto, **location #1**, to obtain the controlled substances, since during the interception of this call, there was background noise consistent with the sounds from the automotive shop, heard repeatedly throughout the wiretaps.
- On April 16, 2013, David Paschall received an incoming call from Weatherley (Ref. 1037/3287), who advised, "A lady up here, a lady's up here, got a hundred 'fives' for two hundred." Paschall asked, "For two hundred?" Paschall added, "You got anything on you until I get there?" Weatherley replied, "Yeah." Based on training, knowledge and experience, your affiant believes the unknown female was at Paschall's Auto, **location #1**, and approached Weatherley, who in turn directed the female to Paschall so she could sell what your affiant believes were five milligram tablets of Oxycodone, for \$200. Your affiant checked electronic video surveillance aimed at Paschall's Auto at that time, and observed an unknown female approach Weatherley on the parking lot of Paschall's Auto. Weatherley was observed holding a cellular telephone to his ear and having a conversation at the time. After the telephone conversation, Weatherley escorted the unknown female toward Paschall's Auto.
- On April 25, 2013, at approximately 5:46 pm, David Paschall called Richard Ashbrook (Ref. 1543/5463). Ashbrook told Paschall, "Give me about a half an hour." David asked, "Yeah?" Ashbrook replied, "Yeah." On that same date, at approximately 6:40 pm, Paschall received a call from Sidney Tawes (Ref. 1546/5463). Tawes told Paschall, "If you get anything tonight, give me a call." On that same date, at approximately 7:00 pm, video surveillance at Paschall's Auto, 8 ■■■ Desoto Road, **location #1**, captured the image of a blue 2002 Ford pick-up truck with Maryland license 5AR 9716, titled to Richard Rader Ashbrook, and known to be associated with him, observed on the parking lot of Paschall's Auto. It had not been present on the lot minutes earlier. At approximately 7:02 pm, Paschall made an outgoing call to Tawes, (Ref. 1550/5476), and told her, "Yeah baby, I got some thirties." Based on the above conversations, your affiant believes that Richard Ashbrook obtained a quantity of

30 mg. Oxycodone tablets, and brought them to Paschall. After Ashbrook was observed at Paschall's Auto, Paschall called Tawes to come purchase them from Paschall. During this investigation, Sidney Tawes was revealed as one of Paschall's most loyal regular customers.

12. On June 18, 2013, at approximately 1:00 pm, Michael Paschall was arrested in Cherry Hill, a high drug trafficking area in south Baltimore. Paschall was in possession of 25 gel capsules containing either cocaine or crack.

D. Evidence of Additional Racketeering Activities.

13. Investigative methods also revealed that this criminal enterprise commits commercial burglaries, home invasion armed robberies, arsons and other crimes. Local law enforcement agencies to include Howard County, Anne Arundel County, Baltimore County, Baltimore City, and dozens more, have been investigating a series of commercial burglaries which occur during the late night or early morning hours, where primarily safes and automated teller machines (ATMs) are targeted and taken. Lottery tickets and cigarettes are also taken along with other valuables. Local law enforcement has determined that Virginia, West Virginia, Pennsylvania and other Maryland jurisdictions have been experiencing commercial burglaries that also appear to have a similar method of operation. The *modus operandi* includes break-ins during the late night or early morning hours; power lines, telephone lines, cables and other wires cut prior to entry; video cameras disconnected or destroyed; suspects entering the premises approaching on foot; a lookout and/or a driver nearby in a getaway vehicle; door locks are removed; after the initial break-in, they leave the location to wait for any response from police; sometimes they remain for two or more hours; video recording systems taken or destroyed; use of pry bars, hammers, flashlights, chop saws, grinders, drills, blow torches; ATMs broken open or taken; safes broken open or taken. A closer examination of some of the events reflected the following

connection to the members of this racketeering enterprise:

a. On September 18, 2011, a commercial burglary was committed at the Shelby Shell gas station in Madison, Virginia. Responding law enforcement discovered all exterior wires (electrical, telephone, alarm system, cables) were cut; two surveillance cameras on the outside of the building were pulled off the wall; vise grips were used to remove the lock from the front door; an ATM was knocked over and had been broken open; the ATM cash drawer was laying nearby and was empty; a safe containing \$5000 had been dragged out of the building and was taken; and \$40,000 worth of cigarettes were also gone. Video cameras on the inside of the business had been pulled down, and the office was ransacked. Video footage (captured prior to the wires being cut), reflected two persons, wearing stocking caps inside the business. A witness described a dark Ford SUV, that looked like an Explorer, in the vicinity of the gas station. A cell tower analysis in the vicinity of the Shelby Shell Gas Station revealed the presence of a cell phone used by David Paschall, at that time. In other words, Paschall's cell phone was hitting off that cell tower, the cell tower closest to the gas station, as opposed to any other cell tower. It puts Paschall's cell phone "in the area."

b. On January 31, 2012, at 9:20 pm a residential burglary occurred at ■ Ridge Road, in Greenbelt, Maryland. The Greenbelt Police Department investigated the matter, which involved a 500 pound floor safe, containing documents and \$1,300, being stolen from the garage. The victim was home during the burglary and observed multiple suspects load the safe into the back of a black Ford Expedition bearing Maryland Registration 3AN9464. This vehicle is registered to Paschall's Auto. On that same date, law enforcement initiated physical surveillance at Paschall's Auto, 8 ■ DeSoto Road, Baltimore, Maryland, location #1. Approximately three to four hours after the completion of this burglary, David Paschall, William Metcalf, and

Robert Lee Koetzle, III, were observed at Paschall's Auto, standing next to the same Ford Expedition. Follow up investigation revealed that the victim had recently hired a driver for a race car that he had stored in the garage and approximately three weeks before the break-in, that driver had come to the house to tow the car to Virginia for a race. An interview with the driver reflected that he brought an acquaintance with him, known only as "Brian" with a last name of possibly "Weatherholtz" who lived in Glen Burnie. At the time, Brian commented on the safe in the garage. The driver further advised that Brian had an older brother and believes the two of them steal heavy construction equipment. The driver once saw Brian trying to "get rid of" a bobcat loader. The driver believed that Brian and his brother commit these acts regularly.³

c. On March 3, 2012, a commercial burglary occurred at the Riverton Shell gas station located at 10 [REDACTED] Winchester Road in Front Royal, Virginia. According to the investigation by the Front Royal Police Department in Virginia, the following items were stolen: approximately \$12,100 in cash, fifty (50) Stage coach .999 silver bars, \$20,000 worth of cigarettes, and a laptop computer. A bottle of Gatorade was also missing from the store. The door lock on the front door had been removed and the telephone lines were cut. A work truck belonging to a business on an adjacent lot had also been stolen. The abandoned truck was recovered the next day in the vicinity. Saws, grinders, crow bars, drills, wire cutters, and other equipment valued at hundreds of dollars had been removed from the truck. On the ground, outside the stolen truck, agents recovered the stolen Gatorade bottle, which yielded the DNA of Ronald Henderson. A few days after the burglary, eight of the stolen Stage coach silver bars were sold at a pawn shop in Anne Arundel County, Maryland. The silver bars were pawned by

³ Your affiant believes this is Jackie Weatherley and his brother, Brian Weatherley.

Heather Stafford, who lives in the same home, 7■211th Street, Pasadena, Maryland, location #21. As part of this investigation, a cell tower analysis in the vicinity of the Riverton Shell gas station revealed the presence of cell phones used by Carl Paschall, Sr., and another person identified as Michael Anthony Zimmerman.

d. On April 8, 2012, in the early morning hours, a commercial burglary occurred at the UVA Credit Union located at 5■Stoneridge Drive in Ruckersville, Virginia. Prior to entry, all cables and power lines were cut. Entry was made through the front door. A motion alarm inside the bank was triggered. When members of the Greene County Sheriff's Office arrived, a foot pursuit ensued and the suspects escaped. Left behind by the suspects inside the bank was a Stihl chop saw, and bags of entry tools. The saw had an obliterated serial number, however agents were able to find a second serial number inside the motor of that saw. It had been stolen from a construction company working a job in Anne Arundel County, Maryland at an earlier date. Cell tower analysis reflected that telephones used by David Paschall, his wife, Mary Paschall, William Metcalf, and three additional "burner" telephones were located within the vicinity of the Credit Union. The point of sale of those three disposable or "burner" telephones was a Wal-Mart Store located in Glen Burnie, Maryland. Security video footage at that Glen Burnie Wal-Mart reflected that on April 5, 2012, these three telephones were purchased by Ronald Henderson, William Metcalf, and Mark Johnson.

e. On May 26, 2012, May 27, 2013 and June 1, 2013, a series of events - all linked to this racketeering enterprise - occurred, and are described below: Beginning on May 26, 2013, during the night, the EZ Mart, located in Harpers Ferry, West Virginia, was burglarized. The suspects cut the phone lines and hid in the woods for 20 minutes. When police did not respond they went inside. A surveillance camera showed they were dressed in all black, covered

head to toe. One suspect carried a very distinct black backpack. The suspects were in the store for over two hours. They broke into the ATM and stole cartons of cigarettes. A safe containing West Virginia Lottery Tickets was stolen.

f. The next day, on May 27, 2012, there was a commercial burglary in the early morning hours at the Handy Mart in Winchester, Virginia. There were two suspects (black masks with eye holes, dark colored sweatshirts, light colored gloves) that were visible on the video surveillance. The suspects cut the wires on the outside of the building, popped the lock on the front door, knocked the motion sensor off the wall, picked up the phone to check for dial tone and then fled the store for approximately a half hour. The suspects then drove up to the rear door in a 2010-2012 Ford E250 panel van (no windows, white, and no front tag) and entered the rear door. Inside they pulled all the wires from the DVR and it stopped recording. The suspects took two floor safes and all the money from the ATM. The surveillance video within the Handy Mart reflected that one suspect carried the same distinct black backpack as observed in the video from the EZ Mart the night before. The backpack is described as black in color, with multiple horizontal straps, multiple exterior pockets with horizontal zippers, and a small white logo containing what appeared to be two letters on the bottom right exterior compartment.

g. Also on May 27, 2013, the same night as the break-in in Winchester, Virginia, a Mexican restaurant, Casa Gonzalez, in Martinsburg, West Virginia, was burglarized during the early morning hours. The phone lines were cut. A floor safe containing \$85,000 worth of jewelry, and \$50,000 in U.S. Currency was taken.

h. On June 1, 2012, Howard County, Maryland police responded to a vehicle fire on the Howard County, Carroll County line. It was a van, fully engulfed in flames. After the fire department extinguished the fire, two large safes along with partially burned West Virginia

Lottery Tickets taken from the Harpers Ferry, West Virginia EZ Mart on May 26, 2012, were discovered inside. The safes had been stolen, one from the EZ Mart, and one from Casa Gonzalez. The van (2012 white Ford E250 panel van, no windows) was observed in the video from the break-in at the Handy Mart in Winchester, Virginia. The VIN on this burned vehicle reflected that it had been stolen from an Enterprise Rental Car Office in Martinsburg, West Virginia. Enterprise was unaware of the theft and had not reported it. The tag on this burned van belonged to a different vehicle. That other vehicle was owned by a third party in Baltimore who had left it for repairs six to eight weeks earlier at House of Metal Auto Body located in the 3000 block of Wilkens Avenue in Baltimore. (One block from Paschall's Auto.) Neither the owner of that vehicle, nor the owner of House of Metal Auto Body, Melvin Oerman, Jr., were aware that the tag had been stolen.

i. On August 4, 2012, at approximately 5:30 am, a home invasion robbery was reported at 3 Hughes Circle, Glen Burnie, Maryland. The property sits on navigable waters on Furnace Creek. The owner, Earl Hughes, rents yard space and access to the water. Hughes, 82 years of age, had been tied up and robbed of his wallet containing approximately \$1,000, credit cards, and prescription medication. The robbers wore ski masks and threw a blanket over him, securing him with flex cuffs and duct tape. Law enforcement reviewed electronic video surveillance at Paschall's Auto, **location #1**, prior to, during, and after the robbery. Prior to the robbery, David Paschall, Michael Paschall, and Jackie Weatherley were observed at Paschall's Auto. Through cell-site precision analysis, law enforcement determined that David Paschall's telephone was within 182 meters (@ 200 yds) of 3 Hughes Circle during the time frame of the robbery. It should also be noted that said telephone was located by the same technology within 14 meters (@15 yds) of Paschall's Auto after the robbery occurred, and at the precise time the

video surveillance captured David Paschall, and Michael Paschall exiting a vehicle and entering Paschall's Auto.⁴

j. On August 6, 2012, a commercial burglary occurred at the Bedington Crossroads store located at 4081 Williamsport Pike in Martinsburg, West Virginia. The telephone lines were cut at approximately 2:42 am. All obvious cables were disconnected, and vise grips were used to gain entry through the front door. The suspects broke into the ATM machine, owned by BB&T bank, but could not access the interior cash drawer. They took a safe containing approximately \$2,300 in cash, \$1,000 worth of postage stamps, and 500-600 unused money orders. Also taken was an additional \$1,785 in coins. A video camera captured two suspects outside of the building at approximately 2:30 am. Both were dressed in all black clothing, ski masks and gloves. One suspect was carrying a backpack. Cell-site precision analysis revealed that Carl Paschall, Sr.'s telephone was within 8 meters (@ 9 yds) of the burglary during the time frame of the burglary. Immediately prior to the burglary, Carl Paschall, Sr.'s telephone was determined to be within 6 meters (@ 6.5 yds) of a nearby Wal-Mart. Video surveillance footage from that Wal-Mart at approximately 1:36 am shows a Grey Chevrolet Avalanche driving through the parking lot. Your affiant knows that Carl Paschall, Sr., has a 2004 Grey Chevrolet Avalanche titled to him at 39 [REDACTED] Glenrose Avenue, Halethorpe, Maryland, location #15. On August 6, 2012, at 2:01 am, a person resembling Chad Paschall was captured on video purchasing a pair of pliers inside the Wal-Mart. Finally, after the

⁴ Hughes had reported a previous burglary at the same location on July 10, 2012, when a safe was taken and Hughes' boat was dumped in the water and set ablaze. Brian Weatherley, and Weatherley's father had been renting space in Hughes' yard, and at the time were in a dispute over the rent owed.

burglary, agents tracked Carl Paschall, Sr.'s telephone back to within 6 meters (@ 6.5 yds) of 20███ Lemmon Street, Baltimore, Maryland 21223, location #16, which is a garage or storage shed owned by Carl Paschall, Sr.

k. On September 10, 2012, at approximately 2:15 am, a commercial burglary occurred at a 7-Eleven store located at 40███ National Pike in Grantsville, Maryland. On that evening, surveillance agents following Carl Paschall, Sr., driving his 2004 gray Chevrolet Avalanche with multiple passengers. Carl Paschall, Sr. dropped the passengers at the 7-Eleven Store in Grantsville and drove away. Detectives observed three suspects dressed in black clothing approach the 7-Eleven Store. One of the suspects climbed onto the roof of the store and was observed cutting the telephone lines to the business. The same suspect then kicked the alarm siren box off of the roof. The suspects broke into the business and transported the floor safe to the front doors of the store. The suspects then attempted to pry into the ATM machine. For some unknown reason, the suspects inside the store fled, and were picked up by Carl Paschall, Sr. in the Chevrolet Avalanche. After circling the area of the 7-Eleven, the suspects eventually headed east on I-68 where a traffic stop was conducted by the Maryland State Police. Five suspects were inside the truck and were arrested. They are identified as Carl Paschall, Sr., Carl Paschall, Jr., Chad Paschall, Thomas Ellis, and Michael Johnson. A search warrant was served on the 2004 Chevrolet Avalanche, and the following items were seized: eight cell phones, multiple black ski masks, GPS Units, two gas powered chop saws, an electric saw, an electric grinder, multiple crow bars and pry tools, two-way radios, a police scanner, and multiple sets of gloves. A distinct black backpack - matching the one captured on video tape, carried by a suspect during the May 26, 2013 break-in at the EZ Mart in Harpers Ferry, West Virginia; and during the May 27, 2013 break-in at the Handy Mart in Winchester, Virginia - was also

recovered. All five were charged locally, and released on bail the next day.

l. On November 24, 2012, just before 2:00 am, a commercial burglary was committed at Steel & Wire Products Company, 15■■■■ West Patapsco Avenue, Baltimore, Maryland 21230. Video recovered from the scene reflected that four suspects gained entry by driving a pick-up truck through an opening cut in the fence surrounding the lot. The suspects cut the telephone lines, and pulled several cameras off the walls. The office was ransacked, three safes were taken, inside of which were three handguns. A vending machine was smashed and all the cash inside was taken. All three safes were busted open and abandoned, in a wooded area behind 26■■■■ and 26■■■■ Hollins Ferry Road, Baltimore, Maryland 21227, locations #19 and #20, respectively. These safes were later recovered by police. These are the residences of Carl Paschall, Jr., and Mark Johnson. On April 14, 2013, David Paschall, and Mark Johnson were arrested in possession of a Colt Junior Semi-automatic .25cal firearm, serial number 77898CC - which was one of the three firearms taken from this burglary. (*See sub-paragraph p, infra.*)

m. Between January 20, 2013 at 6:00 pm and January 21, 2013 at 6:00 am, a commercial burglary occurred at Rivers Construction Group located at 8594 Old Dorsey Run Road in Jessup, Maryland 20794. The gate locks to the business were cut and suspect(s) then entered the yard and stole tools, generators, copper wire, and a 2001 Ford F-450 dump truck, all worth approximately \$53,000. Cell-site precision analysis reflected that the cellular phone used by Carl Paschall, Sr., was 25 meters (@ 27 yards) from the burglary location from 11:25 pm on January 20, 2013 until 2:10 am on January 21, 2013. Upon leaving that location, cell-site precision analysis on Carl Paschall, Sr.'s cell phone reflected travel to the 800 block of Desoto Road, to a green shed behind 8■■■■ Desoto Road, Baltimore, Maryland, location #1, which is also behind the row of houses facing the 2900-3000 block of Wilkens Avenue. (*See aerial*

photograph behind tab #1.) At the same time that said analysis placed Paschall at Desoto Road going toward the shed, surveillance video also captured two unidentified vehicles driving toward the 800 block of Desoto Road, making a sharp right immediately before 801 Desoto Road, and then a left into the fenced in yard immediately prior to and containing the green shed. The stolen F-450 dump truck was recovered on January 23, abandoned on Route 32 west of I-95 in Columbia, Maryland. All other items stolen from Rivers Construction were gone. The inside of the truck had been wiped clean.

n. On March 4, 2013, at approximately 8:31 am, Edmund Chase, 63 years old answered a knock at his front door at 74 ■■■ Mt. Vista Road, Kingsville, Maryland 21087. Chase owns real estate in Baltimore City, and in fact was renting a property at that time to Michael Paschall's mother, Terry Brown. She lived approximately one-half mile from Paschall's Auto. Chase collects rent in cash personally in the neighborhood going door to door each month. At Chase's door that morning was a suspect, white male, approximately 50 years old, with grey hair.⁵ The suspect was wearing a dark blue windbreaker jacket with a police badge around his neck. He told Chase he was a police officer and was investigating a crime. He pointed to inside the home, and when Chase looked in that direction, the suspect barged into the residence, followed by a second masked suspect wearing a red hooded sweatshirt. The victim advised that the first suspect then put on a dark colored masks and demanded money. Both men wore gloves. The victim was struck in the head with a pistol and thrown to the ground, slamming him against a wall. The victim's son came downstairs, and one of the suspects pointed a gun at him and demanded money. He agreed to give the suspects cash. The two victims were tied up with

⁵ Chase was hospitalized following the robbery. He has not yet reviewed a photo line-up.

packing tape and the suspects ransacked the residence, taking approximately \$800-900 in United States Currency, and \$25,000 in jewelry belonging to Chase's wife who was not home at the time. The items taken were carried out in a pillow case and a shopping bag that also contained women's clothing. After the suspects left, the son was able to free himself and his father, and call for police and an ambulance. A video camera on a neighbor's house reflected that prior to the time when the intrusion occurred, what appeared to be two subjects approached the residence operating a vehicle. That vehicle parked in an adjacent driveway. Following the robbery, police located a discarded orange juice bottle in the driveway which was later found to contain a fingerprint of Michael Paschall. As described in Section III, *infra*, during a discussion of 8 [REDACTED] Desoto Road, Baltimore, Maryland, location #3, evidence from this home invasion robbery was later observed at that location by an informant where David Pachall and Michael Paschall took credit for this crime.

o. On March 31, 2013 at approximately 4:12 am, the Cecil County Sheriff's Office responded to a business alarm at Brantwood Liquors at 10 [REDACTED] Augustine Herman Highway located in Elkton, Maryland 21921. Upon arrival, officers observed a vehicle parked on the highway shoulder turn off its headlights. An officer made contact with the vehicle, described as a champagne colored Chevrolet Tahoe bearing Pennsylvania registration JCZ9847, owned by Melvin C. Oerman Jr. (This is the previously mentioned owner of House of Metal Auto Body located in the 3000 block of Wilkens Avenue, one block from Paschall's Auto. *See paragraph 13 h., supra.*) As the officer made contact with the driver, a white female, an assisting officer called out a foot chase with two white male suspects fleeing from a side door of Brantwood Liquors. The phone lines were cut, and the door locks were broken. Oerman reported that the Chevrolet Tahoe had been purchased by Tina Woodland from Oerman Jr., prior to this date, but

had apparently failed to have the title changed. Surveillance teams had been following Carl Paschall Sr. northbound toward Elkton earlier in the evening until he turned his cell phone off and the signal was lost.

p. On April 13, 2013, agents monitoring the wiretap on David Paschall's telephone intercepted Paschall at 6:59 pm, telling customer, Sidney Tawes, that he was waiting for a new drug supply and that he was currently away in Virginia. At 10:04 pm, Paschall also told a second caller that he was in Virginia. At 10:29 pm, Paschall was intercepted speaking with his wife, Mary Estes Paschall. In the back ground male voices were heard discussing a "bank" and a "check cashing business." Another voice asked David Paschall if he was ready. At 11:12 pm, Mary called David again and asked if he was there yet. David advised that "they" were trying to find the right spot. At 11:25 pm, surveillance agents were in Richmond, Virginia, physically following a Ford F-150 pick up truck registered to Richard Ashbrook. Inside the truck observed by surveillance agents was David Paschall, Ronald Henderson and Mark Johnson. Agents observed the truck at a gas station where Mark Johnson climbed onto the bed of the truck and opened a silver tool box. He removed a large yellow motorized masonry saw and was observed comparing the blade to another he had taken from the tool box. Surveillance broke off as the truck started north. On April 14, 2013, at 2:32 am, Mary called David from the telephone at Paschall's Auto, **location #1**. She advised him she was in pain and was taking some Percocet. She also asked him if he was on his way home yet, and told him to be careful. David advised that what he was doing was not going well and that he was not going to take any unnecessary chances. On that same date, at 2:39 am, less than a mile from Ronald Henderson's house at 7 ■■■ 211th Street, Pasadena, Maryland, **location #21** - implication being that they just dropped him off - David Paschall and Mark Johnson were stopped in Richard Ashbrook's truck,

by an Anne Arundel County patrol officer. Johnson was wearing black sweat pants and sweatshirt over top of his jeans and another shirt. Ultimately, Paschall and Johnson were removed from the truck, and the officer searched the front passenger seat area. The officer recovered a dark colored coverall, three pairs of gloves, a flash light, a black jacket, tools, and controlled substances. The coveralls contained a wallet with identification in the name of David Paschall, and the Colt Junior semi-automatic firearm stolen from the November 24, 2012 commercial burglary at Steel & Wire Products Company, in Baltimore, Maryland 21230. The firearm was loaded with 6 rounds, and one in the chamber.

q. On April 19, 2013, at approximately 9:30 pm, surveillance agents were following Carl Paschall, Sr., north out of Baltimore on Interstate 83, who was operating his 2004 Chevrolet Avalanche. Paschall arrived at a McDonalds in York, Pennsylvania, and was met there by Thomas Ellis, an unidentified female, and another male who were in an Acura TL registered to Thomas Ellis. The surveillance team followed the four of them around for several hours into the early morning hours of April 20, 2013, as they drove around York, Pennsylvania. They appeared to be focusing their attention on a liquor store in the 3600 block of Carlisle Road, driving by the location repeatedly. A final surveillance by agents at 3:48 am, reflected both vehicles heading south on Interstate 83 toward Baltimore.

r. On April 21, 2013, just after midnight, surveillance agents again observed the same Chevrolet Avalanche and Acura TL heading southbound on Route 74, circling an area around Delta, Pennsylvania and Whiteford, Maryland. At approximately 2:12 am, both vehicles were followed to an intersection at Sunshine Avenue and Hartford Road, in Kingsville, Maryland. Fork BP gas station is at that location. Agents observed two subjects, dressed in dark clothing with their faces covered, on the side of the gas station at approximately 3:00 am. One

subject appeared to work on the front door and then return to the side. At 3:11 am, agents heard a banging noise from inside the gas station. Minutes later two suspects left the business, one carrying a small item, and the other had a pry tool. At 3:15 am, the Acura pulled closer to the station and a grinding noise could be heard lasting approximately 10-15 seconds. It occurred again every 30-40 seconds, lasting 5-10 seconds. This continued on and off until approximately 3:37 am. At approximately 3:58 am, the Chevrolet Avalanche pulled up across from the business - with a clear view of the front door - and did not leave until 4:35 am. At approximately 5:08 am Carl Paschall, Sr., was observed at a nearby Royal Farms Store in the 9600 block of Belair Road exiting his Chevrolet Avalanche. He walked up to Thomas Ellis sitting in his Acura TL. The men exchanged a "high five," congratulating each other. Tina Woodland, sister of both Carl Paschall, Sr. and David Paschall, was observed sitting in the Avalanche with an unknown female. Carl Paschall, Sr., picked up a ski mask that appeared to have dropped out of the Acura, got into his Avalanche, and left the area. The next morning, the burglary was reported to the Baltimore County Police. The owner reported the loss of \$460 dollars in cash, and 189 cartons of cigarettes. The ATM had been cut open with a blow torch and the cash drawer was on the floor. The cash box had been opened and \$13,240 was stolen.

s. On May 17, 2013, at approximately 6:45 pm, calls between Mark Johnson and David Paschall indicated that they were planning a burglary. Through a series of calls, it was determined that David Paschall, Chad Paschall, Mark Johnson, and Kenneth Smith were going on a "road trip" to a liquor store that David Paschall previously scouted out. If the liquor store did not feel right, they would find something else. They talked about wanting it to rain for them to "work." After 11:00 pm surveillance agents began following the black Ford Expedition belonging to Paschall's Auto. Detectives followed the suspect vehicle with four occupants to

Westminster, Maryland, along the Route 140 corridor. The suspects "cased" a few locations, but their interest kept coming back to a stand-alone Exxon gas station in Finksburg, Maryland, which was dark, unoccupied, and backing to woods. Surveillance observed David Paschall as the driver, Chad Paschall as the lookout in front of the business, and Mark Johnson and Kenneth Smith as suspects that attempted to enter the business. The phone lines to the Exxon were cut, confirmed by calling the business. The front doors had fresh pry marks that were not there when the owner left for the evening. There was a cell-site backup alarm at the location which triggered while three suspects were at the location. Maryland State Police (MSP) responded. Chad Paschall was located leaving the area walking down the street by MSP. Officers interviewed Chad Paschall who claimed to have just been involved in a domestic dispute with his wife, who had left him stranded in Westminster. David Paschall then showed up to pick up his "stranded" son. Mark Johnson was in the car with him. David Paschall made a phone call to Cara Severe, Chad's girlfriend, and told her the fake story to tell police if they contacted her. Severe agreed. Through calls intercepted later, law enforcement learned that Kenneth Smith was left behind in Westminster because they were forced to leave the area.⁶

t. On Monday, June 17, 2013, at 2:43 am, a burglary occurred at Crazy Rays - a salvage or junk yard, in the 2800 block of Hawkins Point Road in Baltimore City, Maryland. A forklift belonging to the business was used to move several junk cars next to a rear upstairs balcony. Suspects climbed on the cars and broke into the office on that level. The forklift was used to pull the safe out from a closet and into the yard where it was broken open. The estimated

⁶ Subsequently, Cara Severe was interviewed by Maryland State Police. She provided a false statement to the police, verifying the cover story that David and Chad Paschall had requested her to provide to the police.

loss is in excess of \$48,000. The manager at Crazy Rays identified Chad Paschall as an employee he had fired back in October of 2012.⁷ Follow up investigation revealed that on Thursday, June 13, 2013, four days before this burglary, David Paschall's telephone was within 9 meters (@ 30 feet) of Crazy Rays from 3:39 am until 4:44 am. The manager also reported that current employee Ryan Monroe (Chad Paschall's half brother) was present and working at Crazy Rays during the day (June 16, 2013) immediately prior to the night of the burglary. David Paschall and Chad Paschall visited Monroe that day at the business. Cell-site precision analysis on David Paschall's telephone reflected that he was within 1700 meters (just over a mile) from Crazy Rays at 2:50 am on June 17, 2013 - during the time of the burglary. Paschall's Auto is eleven miles from Crazy Rays. Video surveillance at Paschall's Auto reflected that at 1:38 am, Paschall Auto's Ford Expedition containing passengers left Paschall's Auto, and returned at 3:14 am, backing the Expedition toward the entrance of 8█ Desoto Road, Baltimore, Maryland, **location #3**. At approximately 5:35 am, David Paschall and others left 806 Desoto Road, walked across the lot and entered 8█ Desoto Road, **location #1**. At 7:01 am, Michael Paschall arrived in his Acura, and was observed minutes later on the lot in conversation with David Paschall, and a few unidentified individuals.

14. The evidence gathered and pieced together reflects an enterprise involved in drug trafficking, commercial burglaries, the interstate transportation of stolen property, bank larceny (which involves the theft of/from bank owned ATMs), arson, and the carrying and use of firearms. This activity is continuous and ongoing. There is every reason to believe that within their homes, their places of business, and in storage sheds and garages identified herein, there

⁷ The manager also reported a previous burglary in November of 2010 with a similar method of operation. Chad Paschall was working at Crazy Rays during that time.

exists evidence of much of this activity. This evidence is in the form of controlled substances, proceeds, stolen goods, tools used to commit the crimes, the vehicles used to commit the crimes, firearms, and documents reflecting these activities and the association between the members of this enterprise. The locations to be searched are described as follows:

III. LOCATIONS TO BE SEARCHED

1. **8█ Desoto Road**
Baltimore, Maryland 21223

Location of: Paschall's Auto

Owner: David Paschall, Jr.
DOB: 12/27/1958, white male

David Paschall has been arrested at least six times between 1980 and 2009. He has been convicted of assault by shooting; a handgun violation; two burglaries; theft; and as recently as 2009, possession with intent to distribute Oxycodone, a schedule II controlled substance.

2. **8█ Desoto Road**
Baltimore, Maryland 21223

Location of: Patriot Fire Stop

Owner: Joseph John Delawder
DOB: 1/13/1966, white male

Joseph Delawder has a 1987 conviction for distribution of cocaine and a 2001 arrest for possession of marijuana.

3. **8█ Desoto Road**
Baltimore, Maryland 21223

Location of: Supreme Auto Glass

Owner: William Matheny
D.O.B: 5/7/1969, white male

William Matheny has no record of arrests or convictions.

Description: These three businesses, **locations #1, 2 and 3** are in a cul-dé-sac which forms a protective compound around them. The 800 block of Desoto Road divides the 2900 and 3000 blocks of Wilkens Avenue. When crossing Wilkens Avenue, leaving the 900 block and entering the 800 block of DeSoto Road, the street makes a dog leg right and then left into what is more like a parking lot than a street. A building on the right houses **8█ Desoto Road, location #1**. On the left, is **8█ Desoto Road, location #3**, and then **8█ Desoto Road, location #2**, is further into the dead end, also on the left. A chain link fence can be closed to block the entire 800 block of Desoto Road. The "end" of

the street is blocked by a chain link fence that runs from the far side of 8█ Desoto Road on the left, across the end of the "street" up to the far side of 8█ Desoto Road, enclosing the area. The area is filled with cars, trucks, boats, shipping containers, tires, dumpsters and other debris. There is only one way in and one way out of this block. *See aerial photographs attached.*

8█ Desoto Road, Baltimore, Maryland, location #1 is the business known as Paschall's Auto - an auto repair shop. This is an off-white painted two story stand alone building containing an office and work bays used as an automotive garage. There is an office located on the second floor. The front of the business has five brown garage doors and an aluminum covered entry door. The building has a parking area secured by a metal fence within the fenced in area of the entire compound. There are surveillance cameras on the outside of the building trained on the front lot. Behind 8█ Desoto is a green shed. To access the shed, instead of making the left into the 800 block of Desoto when approaching from Wilkens Avenue proceed straight into an alley that runs behind the row houses in the 3000 block of Desoto Road. Along that alley is a continuation of the debris, shipping containers, cars, etc from the business at 8█ Desoto Road. Parts of that area behind 8█ Desoto Road are fenced in and include the shed, the only structure behind 8█ Desoto Road. In addition to some fencing, the area is surrounded by woods. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See photographs attached. The shed is visible in the aerial.*

8█ Desoto Road, Baltimore, Maryland, location #2, is the business known as Patriot Fire Stop - a fire restoration business. This location is one of three businesses contained in a white painted cinder block building on the left hand side of the 800 block of Desoto Road when driving into the area. Facing these three businesses, this location toward the right. There is a brown metal door with the numbers "8█" horizontally on a square plaque to the right of the door. There is a metal grate covering the window to the right of the door and there are security cameras on the front of the building. There is chain link fencing surrounding a portion of the front parking area in front of the building. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See photographs attached.*

8█ Desoto Road, Baltimore, Maryland, location #3, is the business known as Supreme Auto Glass. This location is one of three businesses contained in a white painted cinder block building on the left hand side of the 800 block of Desoto Road when driving into the area. Facing these three businesses, this location is on the far left, or closest to Wilkens Avenue and is directly across from 801 Desoto Road. There is a brown metal door with the numbers "8█" vertically on a square plaque to the left of the door. Across the facade of the entire building between, there are several grated windows and loading docks with garage type doors. Without being inside it cannot be known which windows and which

loading docks go with each location.⁸ This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See photographs attached.*

Intercepted in drug related conversations: David Paschall, Joseph Delawder, and William Matheny have all been intercepted in drug related conversations, more fully discussed herein.

Evidence of Participation in burglaries/robberies: David Pachall participates directly in these activities; there is no evidence that Joseph Delawder is involved in these activities; and while there is no evidence that William Matheny is directly involved in these crimes, his shop has been used to store stolen goods.

Additional support to search 8█ Desoto Road, location #1: According to property records 8█ Desoto Road is owned and operated by David Paschall, Jr. Video surveillance places David Paschall, Jr., at that location daily. During the course of this investigation, law enforcement made approximately six controlled purchases directly from David Paschall, Jr., assisted by others working with him inside of Paschall's Auto. Two months of wiretaps in April and May of 2013 confirmed his presence at that location. A review of those calls indicate that 8█ Desoto Road, Baltimore, Maryland, is the primary distribution point for the organization. In many of the conversations described above, it is evident that David Paschall Jr., was telling suppliers and customers of controlled substances to come to Paschall's Auto to further this drug trafficking activity.

During his July 2009 felony drug arrest, for which he stands convicted, Paschall stated, "Yeah, I sell Percocets, but it isn't a big deal." Seized from Paschall at that time were 101 Oxycodone pills in various strengths. The wiretap evidence has demonstrated that Paschall sells controlled substances day and night from this location. He is also involved regularly in the

⁸ Unless agents find that 8█ or 8█ include what appears from the outside to be 804, a separate establishment, there is no intention to seek authorization to search the business in between locations #2 and #3.

commercial burglaries. Items from these events, safes, ATMs, pieces of each, jewelry, documents and other items that could be traced back to, and that are evidence of these crimes, are all believed to be at that location, along with the tools used to commit these crimes, many of those stolen as well. These three businesses, **locations #1, #2 and #3**, are essentially a compound. The area is enclosed and protected. It is fortified by the fences, trees, and isolation from other buildings or residences. As indicated, there are surveillance cameras also in use to warn the persons inside of all three locations. CS9 described "Charlie" flushing hundreds of Oxycodone tablets down the toilet, inside **8[REDACTED] Desoto Road** after seeing police on the monitor. It is precisely the structure and kind of location that would provide secrecy and security for an illegal operation.

Additional support to search 8[REDACTED] Desoto Road, location #2: Numerous conversation were intercepted between David Paschall and Joseph Delawder. Delawder is both a user of drugs but is also involved in the distribution activities with David Paschall. For example, on April 13, 2013, at approximately 10:14 pm, David Paschall received an incoming call from Mary Paschall. (Ref. 2953). Mary Paschall advised, "I just thought I would let you know that Joe stopped over here and got one more morphine pill." She added, "You said that they were five dollars, right? Cause he did not give me. . . I told him that they were five, but he would not give me any money for it." David Paschall replied, "Yeah, alright. What you gonna come over ever fuckin' ten minutes now? I said, what is he going to come over here every ten minutes now?" Your affiant believes that Mary Paschall was telling her husband that Joseph Delawder came across the parking lot from his shop, **location #2 to location #1**, and obtained a morphine pill, a schedule II controlled substances. David Paschall was upset because Delawder did not pay for the pill and was additionally concerned that Delawder was going to show up at Paschall's Auto

repeatedly for more.

On April 25, 2013, at approximately 11:48 am, Delawder called David Paschall. (Ref. 1527/5406). Your affiant believes that in this conversation, Delawder was anticipating the receipt of prescription medications. Delawder said, "It was two doctor visits and four or five therapy appointments, and three medications I got from them. . . I'm glad I didn't get the MRI, so, well anyway, that's the word man, so, so this time next week, . . . be able to put a little money in your pocket." Paschall replied, "Whatever you decide dog. We will split it." Delawder agreed, "We will split it in half buddy, I don't have anybody else. We will split it fifty, fifty." Your affiant believes that Delawder was in the process of obtaining pharmaceutical controlled medications from his doctor and planned to give half to David Paschall for distribution purposes.

Additional support to search 8█ Desoto Road, location #3: Described above, II. Statement of Facts and Circumstances, paragraph 13. n., are the details of a home invasion robbery which occurred on March 4, 2013 at the Kingsville, Maryland home of Edmund Chase, landlord to Michael Paschall's mother, Terry Brown who lived near the 800 block of Desoto Road. On March 7, 2013, a confidential source of information (Ref. not described above) reported to law enforcement that he/she was invited to **8█ DeSoto Road, Baltimore, Maryland, location #1** to look at some diamonds that Michael Paschall wished to sell. Upon arriving at Paschall's Auto, the CS met with Michael Paschall, David Paschall, Chad Paschall and fourth unknown white male. The CS was then taken to the warehouse located across from the garage, believed to be **8█ Desoto Road, Baltimore, Maryland, location #3**. Michael Paschall showed the CS several watches, both men's and women's that he removed from a bag on the floor which also contained some clothing and jewelry that the CS was told was taken during a home invasion robbery committed by Michael Paschall and David Paschall. The

Paschalls boasted intimate details of the crime, the location, the incident, and the victims, that only someone present during the crime could know. The CS also learned from the conversation that Chad Paschall and at least one other person, in addition to David and Michael Paschall were involved. The CS observed a police badge on a neck chain, a bullet proof vest, and a handgun holster lying out in plain sight while at the warehouse. The CS also advised that on other occasions he/she has observed several firearms at this location in the possession of David, Michael and Chad Paschall.

Request for No Knock entry: The very set up of these three properties requires a surprise approach and surprise entry by policy. This applies to all three properties because of their proximity and joint criminal activity. Moreover, the same factors justify **nighttime entry**. These are not residential locations, all the more reason to execute the warrants during the night when it is less likely that others will be present. These three locations are the only properties for which a night time entry is being requested. During two separate controlled purchases conducted at this location, CS1 reported that both Michael Paschall and Chad Paschall were present and each were in possession of firearms. Also, on May 2, 2013, at approximately 6:51 pm, Michael Paschall called Jackie Weatherley. (Ref. 30/310). Michael Paschall told Weatherley to warn his father, David Paschall. He said, "But call Pop real quick. I ain't call him. You got two undercovers out back of the sub shop right there with guns and shit. Sitting there watching. Sitting there and watching. Little Carl just call and said he just seen them, two undercovers with their guns and shit on 'em. Call him right now and let him know." This call reflects the constant awareness and concern for police presence in and around the 800 block of

Desoto Road.⁹ Based on this information and the violent criminal histories of David Paschall and Chad Paschall, your affiant requests a no-knock warrant for this location based on the circumstances presented. This type of entry will allow highly trained specialized personnel to gain entry in a tactical setting to ensure safety to responding law enforcement and occupants, and minimize the destruction of valuable evidence.

Items to be recovered at locations #1 and #3: Law enforcement expects to find pharmaceutical and other controlled substances, related paraphernalia, related documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, stolen goods, instrumentalities and tools relating to the commercial burglaries and home invasion robberies including vehicles and firearms, and other evidence of crimes committed by this enterprise, more fully described in ATTACHMENT C.

Items to be recovered at location #2: Law enforcement expects to find pharmaceutical and other controlled substances, related paraphernalia, related documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, vehicles, and other items more fully described in ATTACHMENT D.

⁹ In a subsequent call Weatherley advised Michael Paschall the police officers were not looking at Paschall's Auto that day, but were investigating an assault that occurred a day prior at the sub shop located in the 2900 block of Wilkins Avenue. Paschall and his father, David Paschall were not on speaking terms, however, this did not prevent Michael Paschall from looking out for his father's welfare and the security of the criminal enterprise. He did it by contacting Jackie Weatherley with whom he knew his father was in constant contact in the drug business.

4. **7█ Meadowbrook Avenue,
Catonsville, Maryland 21228**

Home of: David Paschall, Jr. (& Mary Estes Paschall)
DOB: 12/27/1955

Description: Described as a two story duplex (facing property - the right side), with tan-light brown siding, shingle roof, white front entry door. On both sides and along the top of the door are small window panes. There is a porch with a white railing, and a porch light affixed to the gray siding to the right of the front door. The numbers "7█" in gold, are attached to the front porch support pole on the right side of the 7 or so steps up from the front yard. The front yard is very small with a telephone pole no less than 5 feet in front of the steps up to the porch. All windows are trimmed in white and there are no shutters. The back yard is fenced in by a wood privacy fence. The shingles on rear portion of the roof are in three different colors. The house is located in Catonsville, Maryland 21228. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photographs.*

Intercepted in Drug related conversation: Yes (both)

Evidence of Participation in burglaries/robberies: Yes (both)

Criminal record of arrest/convictions: David Paschall has been arrested at least six times between 1980 and 2009. He has been convicted of assault by shooting; a handgun violation; two burglaries; theft; and as recently as 2009, possession with intent to distribute Oxycodone, a schedule II controlled substance.

How do we know he lives there: A recent utilities check revealed that 7█

Meadowbrook Avenue, Catonsville, Maryland 21228, is in the name of Mary Catherine Estes, since 2001. Maryland property records reflected that during June 2013, 7█ **Meadowbrook Road, Catonsville, Maryland 21228**, is listed to Mary Catherine Estes and David E. Paschall Jr. On December 7, 2012, assisting law enforcement conducted surveillance at this location. Officers observed the black Ford Expedition with Maryland license plates, 3AN9464, registered to "Paschall Auto." As recently as May 18, 2013, David Paschall operated this vehicle when he and others attempted to break-in to the Exxon gas Station in Finksburg, Maryland.

Additional Support to search these locations: During the two months on David

Paschall's telephone, agents intercepted numerous drug related conversations between David and Mary Paschall. Both are users of Oxycodone and Percocet. From the intercepts your affiant knows that Mary Paschall is fully aware of her husband's criminal activities. She was present during one of the purchases conducted by CS1 from David Paschall at Paschall's Auto. She answers the phone at Paschall's Auto, relays information about pills, and calls and checks on him while he is out scouting locations to burglarize. As previously described, on April 14, 2013, David Paschall and Mark Johnson were arrested by the Anne Arundel County Police Department in possession of a stolen firearm. The next day, David Paschall and his wife, Mary Paschall were intercepted discussing the arrest. Mary Paschall asked, "did they find the other?" David Paschall replied, "Oh my God, nope, they didn't find the other one babe." From the context of the conversation, your affiant believes that there was a second firearm in the vehicle that the arresting officers failed to find during their search. This firearm could of course be at his business at 8 ■■■ Desoto Road, location #1, at his home, 7 ■■■ Meadowbrook Avenue, location #4, or anywhere else related to this enterprise. It is, however, expected that stolen items from the burglaries and/or home invasion robberies with which David Paschall has been involved, that evidence related to these crimes will be in his home as well as in his place of business. Moreover, Paschall's wife, Mary Estes Paschall is directly and affirmatively involved in his drug trafficking, and therefore it is likely there are controlled substances located within this location.

Request for No-Knock Entry: Because of the violent criminal history of David Paschall, and the violent nature of some of the crimes described herein, your affiant requests a no-knock warrant for this location based on the circumstances presented.

Items to be recovered at the location: Law enforcement expects to find pharmaceutical

and other controlled substances, related paraphernalia, related documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, stolen goods, instrumentalities and tools relating to the commercial burglaries and home invasion robberies including vehicles and firearms, and other evidence of crimes committed by this enterprise, more fully described in ATTACHMENT C.

5. **16■■ Inverness Avenue
Baltimore, Maryland 21230**

Home of: Chad Paschall (& Cara Marie Severe)
DOB: 9/9/1984; white male

Description: The residence is further described as a two story rowhouse with red, brick siding. The residence has a brown front door with white molding surrounding the exterior door. There is a chain link fence approximately 3-4 feet high around the front yard of the residence. A sidewalk leads to 2-3 steps and a front, covered porch with a white railing. The porch covering is a light brown or tan colored material with horizontal lines in it and it is trimmed in a white scalloped edge. There are two white columns that support the front of the porch overhang, and "16■■" is displayed vertically in dark numbers going down the right column. There is a double sashed window to the right of the front door and another window on the second level on the right portion of the rowhouse with an awning that matches the material of the front porch covering. There is a black mailbox on the red brick to the right (facing the property) of the entrance door. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photographs.*

Intercepted in drug related conversations: Yes

Evidence of Participation in burglaries/robberies: Yes

Criminal record of arrest/convictions: Yes. Chad Paschall was charged in the September 10, 2012 attempted break-in of the 7-Eleven in Grantsville, Maryland with 2nd Degree Burglary; Was convicted in 2007 for Second Degree Assault; and in 2003 for Robbery.

How do we know he lives here: During June, 2013, a check was initiated through online Maryland property records. According to those records, 16■■ Inverness Avenue, Baltimore, Maryland 21230 is listed to Chad E. Paschall. A Deed of Trust indicates that this address was purchased by Chad E. Paschall in 2009. A recent utilities check revealed that the service at 1635 Inverness Avenue, Baltimore, Maryland 21230 is in the name of Chad Eric Paschall, since 2009. Chad Paschall has told different people on the telephone (recorded jail calls and the wiretap) that he purchased a home in Morrell Park and is living with his children's mother, who your affiant knows is Cara Severe. On Friday May 24, 2013 at 3:40 pm, a maroon

Ford F-150 registered to Cara Severe, at 8[REDACTED] Desoto Road, Baltimore, Maryland, location #1, was observed parked across the street from the residence. Cell-site precision analysis has aided in placing both Chad Paschall and Cara Severe at the residence while comparing their location to incoming calls monitored on a recent wire-tap investigation. On May 18, 2013, when questioned by the Maryland State Police in reference to the attempted burglary at an Exxon in Finksburg, Maryland, Chad Paschall provided his address as 16[REDACTED] Inverness Avenue in Baltimore, Maryland. On June 17, 2013, at approximately 2:39 pm, video surveillance at 801 Desoto Road, Baltimore, MD, Paschall's Auto captured Chad Paschall and Cara Severe enter the maroon 2002 Ford F-150 truck registered to Severe and exit the lot at Paschall's Auto. Chad Paschall was driving. A short time later, your affiant saw the same truck parked in front of 16[REDACTED] Inverness Avenue, Baltimore, Maryland.

Additional Support to search these locations: Chad Paschall was arrested with his uncle, Carl Paschall, Sr., his cousin, Carl Pashcall, Jr., Michael Johnson and Thomas Ellis on September 10, 2012 after committing the commercial burglary at a 7 Eleven in Grantsville, Maryland, described herein. Chad Paschall has been involved with "scouting" out target locations for burglaries with his father, David Edward Paschall and his uncle, Carl Parrish Paschall Sr. Chad Paschall has been observed frequently at Paschall's Auto where he has been involved in numerous drug transactions. Most recently, Chad Paschall travelled with other named targets to an Exxon Gas Station located in Finksburg, Maryland in a black Ford Expedition registered to Paschall's Auto, owned and operated by David Paschall. Chad Paschall acted as the "lookout" while other suspects attempted to break into the business. Chad Paschall is known to be involved in commercial burglaries where cigarettes, US Currency, handguns, and other items were stolen. During the course of this investigation, your affiant and assisting law

enforcement utilized CS1 to make several controlled purchases from David Paschall, at Paschall's Auto. During one of the purchases, CS1 saw a person believed to be Chad Eric Paschall in possession of a handgun. Paschall's wife, Cara Severe, also purchases illicit prescription medications from her father-in-law, David Paschall. She has bought pills on numerous occasions and has been observed on electronic video surveillance as recent as May 15, 2013 at Paschall's Auto buying pills. Severe drove to Paschall's Auto and made phone calls to David Paschall asking if he had "anything" and when he would be back. She waited approximately 45 minutes and immediately met David Paschall when he returned and walked inside Paschall's Auto. Less than 5 minutes later, Severe was seen exiting the shop and driving away in her maroon Ford F-150. Finally, Cara Severe recently lied to police in a cover story when Chad Paschall was attempting to break into the gas station on May 17, 2013.

Request for No Knock Entry: Your affiant understands that Chad Paschall has been known to wear a handgun. During a controlled purchase CS1 reported that Chad Paschall was at Paschall's Auto and was in possession of a firearm. In Chad Paschall's criminal history, he was involved as the shooter during an assault. Chad Paschall is prohibited from possessing a firearm due to his criminal history. Your affiant requests a no-knock warrant for this location based on the circumstances presented.

Items to be recovered at the location: Law enforcement expects to find pharmaceutical and other controlled substances, related paraphernalia, related documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, stolen goods, instrumentalities and tools relating to the commercial burglaries and home invasion robberies including vehicles and firearms, and other evidence of crimes committed by this enterprise, more fully described in ATTACHMENT C.

6. **19■■ Grinnalds Avenue**
Baltimore, Maryland 21230

Home of: Michael Paul Paschall
DOB: 8/27/1979, white male

Description: 1930 Grinnalds Avenue, is a two story brick rowhouse with a white security door with vertical metal or iron strips, and a dark inner door. A mailbox is located to the left (facing the property) of the door. Yellow and white awnings top the second floor windows. Above the front door is a transom with stained glass containing the numbers "19■■." There is a shared covered porch with the rowhome to the right. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photographs.*

Intercepted in drug related conversations: Yes

Evidence of Participation in burglaries/robberies: Yes

Criminal record of arrest/convictions: Yes. Michael Paschall has a 2009 arrest for violating a protective order, and a 2006 arrest for first degree assault. He was convicted of possessing a deadly weapon (shotgun) in 1998.

How do we know he lives there: In June 2013, Maryland property records reflect that the home is owned by Belinda L. Paschall and Michael P. Paschall. Records further reflect that a Belinda Coe purchased 19■■ Grinnalds Avenue, in 2008. In 2011, the property was transferred to Belinda L. Paschall and Michael P. Paschall. A recent utilities check revealed that the service at 19■■ Grinnalds Avenue, Baltimore, Maryland 21230, is in the name of Belinda Burlingame-Paschall, believed to be Michael Paschall's wife. As recently as June 11, 2013, law enforcement observed Michael Paschall arrive at the location operating his white Acura, with Maryland license plates 5FZ G27, listed to his wife at this address. Michael Paschall got out of the Acura and directly entered the location without hesitation. In other words, he did not knock and wait to gain entrance.

Additional Support to search this location: Between February 14, 2012 and May 15, 2012, your affiant and assisting law enforcement performed six "trash covers" (seized the

abandoned trash at the curb and searched it) at this location. At least two of those searches yielded positive findings for Oxycodone, a controlled substance. Four different informants, CS3, CS4, CS5 and CS6, all described Paschall's distribution of drugs going back to 2009 and continuing until 2013. In late 2012, CS5 reported that Michael Paschall was getting quantities of Oxycodone from a New York source early each week. CS5 estimated the amount to be approximately three hundred to four hundred tablets with strengths of 30 and 80 milligram. In addition to the historical information about Michael Paschall's drug trafficking, he has been involved in at least one home invasion robbery in Kingsville, Maryland on March 4, 2013 with his father. One of them was armed with a firearm and pistol whipped the victim.

On June 18, 2013, Michael Paschall was arrested in Cherry Hill - previously described - where he was probably distributing the cocaine he had on him. Based on all of the above, your affiant believes that Michael Paschall is currently storing evidence pertaining to the distribution of controlled substances, home invasion robberies, firearms, and other evidence of his participation in this criminal enterprise at his residence located at 19■■ Grinnalds Avenue, Baltimore, Maryland 21230.

Request for No Knock Entry: Your affiant requests a no-knock warrant for this location based on the evidence described above. Your affiant believes that Paschall was involved in the violent home invasion robbery in Kingsville, where his fingerprint was found on a bottle in the driveway. The victim of that robbery was hospitalized with a head wound from being pistol whipped. During a controlled purchase conducted during approximately September, 2012, a Confidential Source reported that Michael Paschall was in possession of a semi-automatic handgun, believed to be a 9mm. Your affiant believes Michael Paschall is violent, and could be armed. Without the element of surprise, the lives of all would be endangered.

Items to be recovered at the location: Law enforcement expects to find pharmaceutical and other controlled substances, related paraphernalia, related documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, stolen goods, instrumentalities and tools relating to the commercial burglaries and home invasion robberies including vehicles and firearms, and other evidence of crimes committed by this enterprise, more fully described in ATTACHMENT C.

7. **3█ Bigley Avenue**
Lansdowne, Maryland 21227¹⁰

Home of: Jackie Weatherley, Jr. (& April Whitaker)
D.O.B: 2/28/1983

Description: The residence is further described as a two story red brick row house with blue/gray siding, a gray shingle roof, and a white storm door. The numbers "3█" run vertically along the wooden porch support pole. There is a wood slatted fence edging the front yard. A green mailbox can be seen prominently over the top of the fence in front. This property is in Lansdowne, Maryland. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photographs.*

Intercepted in drug related conversations: Yes.

Evidence of Participation in burglaries/robberies: Possible involvement.

Criminal record of arrest/convictions: He was arrested for Distribution of CDS on February 16, 2011, Escape on September 30, 2011, and First Degree Assault on February 2, 2001, and later convicted of the charges.

How do we know he lives there: On June 3, 2013, assisting law enforcement initiated surveillance at 3█ Bigley Avenue. At that time, Weatherley arrived in a Chrysler 300 vehicle and entered 3█ Bigley Avenue without hesitation. A recent utilities check revealed that the

¹⁰ On June 10, 2013, your affiant contacted CS7, who reported he/she could not provide any updated information on Weatherley's activities but mentioned that Weatherley's residence and the rowhouse next door were "related." CS7, reported that in the past he/she heard that Weatherley's residence and the house next door, were modified to have internal access between both locations. According to CS7 Weatherley owns both. CS7 heard that "Bobbie" was living in the residence next door. Your affiant knows that Robert Koetzle lives at 3█ Bigley Avenue, Lansdowne, Maryland. Koetzle has been observed at Paschall Auto and was seen exiting the Expedition registered there on the afternoon following the burglary in Greenbelt on January 31, 2012 described above. That property at 3█ is owned by Weatherley's parents. Your affiant is not seeking a search warrant for Koetzle's home. If it should be determined however, while inside of 3█ Bigley, that 3█ is an extension of 3█, agents will seek advice on entering that property.

service at 3 ■ Bigley Avenue, Lansdowne, Maryland 21227 is in the name of Jackie M. Weatherley, since 2006. During June, 2013, Maryland property records reflect that 3 ■ Bigley Avenue, is owned by Jackie M. Weatherley Jr. This location was also the target of a search warrant in February of 2011. At that time, Weatherley admitted that he is a “middle man” between other people for the distribution of pills. On December 7, 2012, assisting law enforcement conducted surveillance at the residence of Jackie Weatherley. Two vehicles used by Weatherley, a Nissan Armada and a white Hummer H2, are observed at his house regularly.

Additional Support to search these locations: Described above, several confidential sources of information, CS7, CS8, CS9 and CS10, all provided information about Weatherley and his drug distribution activities. From these informants your affiant knows that Weatherley obtains prescriptions from other persons. On May 22, 2013, law enforcement was intercepting calls over a telephone used by Weatherley. Based on a telephone call (Ref. 749/5800) your affiant believed there was going to be a meeting. Surveillance agents were dispatched to a Safeway Pharmacy, located in Westminster, Maryland. Agents observed a person identified as Alan Hinkle operating a tractor trailer arrive at the meet. Hinkle entered Safeway Pharmacy and obtained a prescription for Oxycodone, a controlled substance. Weatherley then met with Alan Hinkle who entered the passenger side of Weatherley’s Nissan vehicle. After several minutes, Hinkle got out of Weatherley’s vehicle and subsequently left the area. It is believed, based on the actions of both parties, that Hinkle obtained his prescription of Oxycodone and sold it to Weatherley.

On May 18, 2013, at approximately 1:26 pm, Weatherley made an outgoing call to April Whitaker, with whom Weatherley lives at this location. (Ref. 627/4307). Weatherley asked Whitaker, “Where, where’s them, where’s them one things at, that you were supposed to get rid

of \$200 worth of?” Whitaker replied, “I got em in the cars, and a couple with me.” Weatherley, sounding upset, said, “Cause Nick wanted \$150 worth but I guess I’m just fucked. Ahh just blew money everywhere, aright.... aright I’ve gotta go I gotta get these kids ready for the party.”

Based on training, knowledge and experience, your affiant believes that “them one things” was coded conversation for controlled substances and that one of Weatherley’s customers wanted \$150 worth of controlled substances from him. Weatherley was at home (getting kids ready for the party) but was checking with his wife/girlfriend to see where she had put the drugs.

Request for No Knock entry: No.

Items to be recovered at the location: Law enforcement expects to find pharmaceutical and other controlled substances, related paraphernalia, related documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, vehicles, and other items more fully described in ATTACHMENT D.

8. **10[REDACTED]7th Street**
 Glen Burnie, Maryland 21060

Home of: Jackie Weatherley, Sr.
 Karen Gail Weatherley
 Brian Weatherley
 (Parents and brother of Jackie Weatherly, Jr.)

Description: The residence is further described as a two story split foyer single family home, with light grayish blue siding, and a light gray shingle roof. There is a dark wooden front door, a white screen door, and all of the windows are trimmed in with black shutters. The numbers "10[REDACTED]" in black are visible on mailbox at the chain link fence that separates the front yard from the drive way. The numbers also appear on the right facade (facing the property) which is the driveway side of the residence. This house is located in Glen Burnie, Maryland 21060. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photographs.*

Intercepted in drug related conversations: Karen Weatherley and Brian Weatherley and Jackie Weatherly, Sr., have all been intercepted in drug related conversations.

Evidence of Participation in burglaries/robberies: Yes - Brian Weatherley.

Criminal record of arrest/convictions:

Jackie Weatherley, Sr., has four convictions between 1983 and 2002 for disorderly conduct, battery, several disorderly conducts, and resisting arrest.

Karen Weatherley was convicted in 1987 for battery.

Brian Weatherley has ten arrests and/or convictions beginning in 2004 for theft, disorderly conduct, counterfeiting, conspiracy, burglary and violating protective orders.

How do we know they live there: Jackie, Sr., and Karen are Jackie Weatherley, Jr.'s parents. Brian is his brother. A recent utilities check revealed that the service at this location is in the name of Karen G. Weatherley, since 1998. On April 16, 2013, CS7 as described herein, reported that Jackie Weatherley Sr., was selling his prescription medication from his residence in Glen Burnie, Maryland, believed to be 10[REDACTED]7th Street, Glen Burnie, Maryland. CS7 reported that Brian Weatherley lives at that location with his parents. During June, 2013, a

check was initiated through online Maryland property records. According to those records, 10[REDACTED] 7th Street, Glen Burnie, Maryland 21060, is currently listed to Jackie Weatherley Sr. and Karen G. Weatherley

Additional Support to search this location: On May 5, 2013, a cellular telephone utilized by Jackie Weatherley received an incoming call from an unknown male (Ref. 62/629). The unknown male advised Weatherley that he had a person that had sixty "fifteens" for six dollars a piece. Jackie Weatherley told the male to meet him at his parent's house. Based on training, knowledge and experience, your affiant knows that "fifteens" is a street term used to describe 15 milligram tablets of Oxycodone. On May 11, 2013, Jackie Weatherley called his mother, Karen Weatherley, (Ref. 356/2461). He asked, "Remember the last time I gave you the \$4,500, I gave April the \$4500 to give Daddy?" Karen Weatherley replied, "Yeah cause the, April had it separate." Jackie Weatherly continued, "Aright so now this one's five that George gave me too. So it takes 1000 off." Karen Weatherley asked, "So just hold that here and then I take it over there?" Jackie Weatherley replied, "Yep." Your affiant believes based on this conversation, that Jackie Weatherley and his mother Karen Weatherley were having a conversation about illegal drug proceeds. It is believed that at the time of the telephone call, Karen Weatherley was at her residence, 10[REDACTED] 7th Street, Glen Burnie, Maryland 21060.

On May 11, 2013 at 2:04 pm, Karen Weatherley called her son, Jackie. (Ref. 350/2444) She asked him, "You have a, um, a 1000 and 85 dollars on you? You can give to Brian?" Weatherley replied, "What?" She repeated, "a 1058 dollars." Weatherley told her he wasn't home but wanted to know what she needed it for. Karen Weatherley explained, "He's got this guy, that got 48 of them. Instead of him running all the way back out here, and all the way back up there. . ." Jackie said, "Mike is with him." His mother said, "Mike don't have it on him."

Jackie Weatherley told his mother he'd be there. Your affiant believes that Brian Weatherley, Jackie's brother, was with "Mike" and that they were attempting to obtain 48 units of drugs, but needed Jackie to spot him the cash until he could get his which was back at home with his mother, Karen Weatherley.

Finally, Brian Weatherley has been implicated in the January 31, 2012 burglary at the home in Greenbelt, Maryland.

Request for No Knock Entry: No.

Items to be recovered at the location: Law enforcement expects to find pharmaceutical and other controlled substances, related paraphernalia, related documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, vehicles, and other items more fully described in ATTACHMENT D.

9. **35█ Horton Avenue**
 Baltimore, Maryland 21225

Home of: Michael Terry
 DOB: 8/3/1961, black male

Description: This residence is further described as a two story brick row house with a basement. Across the first floor (right to left facing property) is an entrance door and two windows all trimmed in white. There is a porch outside of the front entrance door and the first window to the left of the door, with an overhang. There are concrete steps, at least 10 of them, leading up to the porch. The numbers "35█" appear on the upper center of the white house door behind a white framed storm door. The rowhouse to the right of this property has the numbers "35█" on the white pillar holding up the shared porch overhang. This location has a porch light and mailbox to the left of the entrance door on the red brick. There are two windows on the second story, one smaller to the right. There is one basement window on the left front to the left of the porch. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph.*

Intercepted in drug related conversations: Yes

Evidence of Participation in burglaries/robberies: No

Criminal record of arrest/convictions: Yes. Terry has been convicted for possession of controlled substances in 2011, and theft in 1980.

How do we know he lives: A recent utilities check conducted at 35█ Horton Avenue revealed that the service is in the name of Jarnette Jones, since April of 2000. On June 13, 2013, at approximately 10:00 am, surveillance was conducted at this location. Agents observed Michael Terry exit the rear door of this house and entered a pick up truck. On June 17, 2013, Michael Terry was surveilled at Paschall Auto, at 8█ Desoto Road, Baltimore, Maryland. He was observed on the parking lot in conversation with David Paschall. Terry was in a black 2006 Dodge Ram. This vehicle is registered to Terry and Jarnette Jones at 35█ Horton Avenue, Baltimore, Maryland. Agents also observed another individual enter Terry's car and conduct what appeared to be a drug transaction. Cell cite precision analysis reflects that Terry is at this location nightly.

Additional Support to search this location: The wiretap reflected that Terry is one of David Paschall's suppliers and occasionally buys from David Paschall. During the two months on David Paschall's telephone, there were 244 calls between Paschall's telephone and Michael Terry's telephone. Of those, 93 calls were considered pertinent, drug related. Typically they would speak about "scrambled eggs," which your affiant knows to be code for heroin, and/or "eight balls," which your affiant knows is a measure (1/8 of an ounce) of cocaine. For example, on April 1, 2013, David Paschall called Michael Terry (Ref. 42). Paschall asked, "I said how fast can I get one." Terry replied that Paschall could get one "right now." Paschall told Terry, "I'm at the shop and I want get, I want get an eight ball." Based on my familiarity with this case, your affiant knows that the "shop" is Paschall's Auto, located at 8■■■■Desoto Road, Baltimore, Maryland, location #1. On April 3, 2013, at approximately 7:09 pm, David Paschall received a call from Michael Terry (Ref. 216/619). Chad Paschall answered his father's telephone, and Terry and Chad Paschall discussed "scrambled eggs." David Paschall, who is at Paschall's Auto at the time, told Chad Paschall to tell Terry that David Paschall needed "eight." Chad Paschall relayed the information to Terry. Terry advised that he had to get the money first and then he would meet them at Paschall's Auto. Your affiant knows, based on training, knowledge and experience, that "scrambled eggs," a street term used to describe diluted heroin, is usually packaged or sold in gelatine capsules.

Request for No Knock entry: No

Items to be recovered at the location: Law enforcement expects to find pharmaceutical and other controlled substances, related paraphernalia, related documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, vehicles, and other items more fully described in ATTACHMENT D.

10. 21■■ Whistler Avenue
Baltimore, Maryland 21230

Home of: Richard George Braitsch, Jr.
DOB: 8/25/1974, white male

Description: Described as a two story red brick row house, with a gray shingle roof, a white inner door, and a white storm door. Black numbers "21■■" appear to the left of the front entry door on formstone surrounding the front door. The numbers run diagonally down to the right. To the left of the numbers on the red brick is a white mailbox. There are at least 8 or more concrete steps from the street level to a landing which contains the yard, and 4 or 5 brick steps from the landing up to the front door. There is one double window on the second story on the left (facing property) and a double window on the first floor immediately below the second story windows. There is a gable on the roof between this house and the house to the right. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph.*

Criminal record of arrest/convictions: Braitsch has two convictions for felony possession of controlled substances, from 2001 and 2005.

Intercepted in Drug conversations? Yes.

Evidence of Participation in burglaries/robberies: No.

How do we know he lives there: In June 2013, Maryland property records reflect that the home is owned by Richard G. Braitsch Jr. There is a mortgage on the property in the names of Richard G. Braitsch Jr. and Carmelita M. Expectacion, since 1998. A recent utilities check revealed that the service at this location is in the name of of Richard George Braitsch, also since 1998. On June 3, 2013, at 1:30 pm, law enforcement observed Richard Braitsch arrive at 2■■ Whistler Avenue, Baltimore, Maryland 21230 in his gold Ford Freestyle SUV. It is registered to him, at another location, his parents' house. During the June 3, 2013 surveillance, Braitsch parked the vehicle and entered 21■■ Whistler Avenue, Baltimore, Maryland without hesitation. This vehicle has been observed parked in front of this location regularly and he has been seen in it at Paschall's Auto.

Additional Support to search this location: Richard Braitsch was intercepted in drug related conversations with David Paschall. For example, on April 18, 2013, David Paschall received a call from Braitsch who asked about “blinkies,” which your affiant knows is a street term used for Oxycodone. (Ref. 3708) Paschall told Braitsch that he needed twenty blinkies. They discussed the price, with two “fifteens” selling for \$25. Your affiant understands this to mean, two 15 milligram Oxycodone tablets. Braitsch advised that would call and find out what quantity of Oxycodone was available for purchase. In a subsequent telephone call on the same day at approximately 1:06 pm, (Ref. 1120/3709) Braitsch called David Paschall and said, “She said she has some. She thinks she has about four to five thirties, and she has some tens and stuff like that.” David Paschall told Braitsch that Paschall would take all of the “thirties,” a street term for 30 milligram Oxycodone tablets. Braitsch advised he was getting his children ready and would be over. Electronic video surveillance operating at Paschall’s Auto, and on April 18, 2013, at 1:30 pm, reflected Richard Braitsch arrived at Paschall’s Auto operating his gold Ford Freestyle SUV with two children inside. All three went into the office at Paschall’s Auto. At 1:45 pm, Braitsch, two kids and an unknown male left the auto shop. At approximately 3:00 pm, surveillance agents observed Braitsch and two children arrive in the gold Ford. All three entered the residence at 2100 Whistler Avenue without hesitation. Based on the telephone conversation and surveillance, your affiant believes that Richard Braitsch obtained Oxycodone from “her” for Paschall and delivered them to him.

On April 25, 2013, at approximately 9:30 am (Ref.1519/5387), David Paschall called Richard Braitsch and advised that he needed “a little of that shit.” Braitsch advised he had to go home to pick up the “shit.” Braitsch advised that he was out with his kids, would take them home, and would bring it to Paschall. Braitsch also advised that he was looking for “blinkies,”

which are 30 milligram Oxycodone tablets. At 11:15 am, Braitsch arrived at 8█ Desoto Road. He left there at 11:45 am, stopped at 16█ Inverness Avenue, location #5, home of Chad Paschall and Cara Severe, and returned to his home at 21█ Whistler Avenue, location #10.

Request for No Knock entry: No.

Items to be recovered at the location: Law enforcement expects to find pharmaceutical and other controlled substances, related paraphernalia, related documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, vehicles, and other items more fully described in ATTACHMENT D.

11. **5■ Carlsbad Court**
Lansdowne, Maryland 21227

Home of: William Henry Matheny, Jr.
D.O.B: 5/7/1969, white male

Description: Described as a two- story red brick row house with white siding, a red inner door and a white or tan storm door. It is the end of the row, on the left (facing the property). Black numbers "5■" appear on a mailbox post inside a fence surrounding the front yard. There are three connected windows on the first floor to the left of the front door, and three windows immediately above on the second floor. There is a light immediately over the front door on the red brick. The front of the house has a white picket type fence surrounding the yard. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photographs.*

Intercepted in drug related conversations: Yes

Evidence of Participation in burglaries/robberies: Limited.

Criminal record of arrest/convictions: No.

How do we know he lives there: A recent utilities check revealed that the service at 5■ Carlsbad Court, Lansdowne, Maryland 21227, is in the name of William Henry Matheny III, since 2012. On June 11, 2013, surveillance agents observed William Matheny arrive at approximately 5:05 pm at this location. Matheny exited the vehicle and entered the home without hesitation. In February of 2013, a confidential source reported that Matheny lives with his son in Lansdowne near "Vero Court." Your affiant knows that Carlsbad is just off of "Bero Court."

Additional Support to search this location: Both CS9 and CS10 described above identified Matheny as a drug associate of the Paschalls and of Jackie Weatherley. Both specifically reported that Matheny was selling large quantities of Oxycodone tablets, 30 milligram strength to the Paschalls. On April 11, 2013, David Paschall called William Matheny (Ref. 799/2504). Paschall asked Matheny, "Yeah, you got, you got a couple 3's? Matheny said

he did. Paschall replied, "Bring a couple over." Matheny asked, "Alright, how many do you want? One Hundred?" Paschall said, "Yeah." Your affiant, based on training, knowledge and experience knows that "three's" is a street term used to describe 30 milligram tablets of Oxycodone a controlled substance. Based upon the context of this call and others before and after, "one hundred" refers to one hundred dollars worth of Oxycodone. Matheny advised that he was at Jackie Weatherley's house, 3█ Bigley Avenue, Lansdowne, Maryland, location #7, and would bring them right over.

On April 30, 2013, Jackie Weatherley called Matheny, (Ref. 14/109). Weatherley asked Matheny what he was doing. Matheny said, "What's up dude.. came up to the shop real quick. Yeah, Dave asked me to come up here, had a couple of people up here and he needed sumptin..sumptin." Your affiant believes based on training, knowledge and experience, David Paschall had customers and that "sumptin..sumptin" was coded conversation referring to controlled substances that David Paschall needed Matheny to supply. Your affiant further believes that Matheny was at 8█ Desoto Road, location #1, to accommodate Paschall.

On May 2, 2013, Matheny called David Paschall (Ref. 1972/6990). Matheny told Paschall that he provided the "paint man" with controlled substances. Your affiant knows that the "paint man" is Domenico Panza, who sells automotive paint and also buys pills from David Paschall. Matheny wanted to make sure the sale was okay with Paschall because the sale occurred at Paschall's Auto. Paschall told Matheny he had other people selling drugs at the shop, but advised Matheny not to make a habit of it. Matheny also told Paschall he was on his way to purchase fifty "strips" from someone, adding that the "strips" "sell like water." Based on training, knowledge and experience, "strips" is a street term used to describe packages of Suboxone, a schedule III controlled substance.

On May 17, 2013, at approximately 9:24 pm, Matheny called Jackie Weatherley. (Ref. 587). During the call Weatherley asked Matheny if he had spoken to "Robert."¹¹ Matheny told Weatherley that "Robert" indicated that he knew someone that was selling some "Blues." Matheny added that it was "Robert's" mother that had the "blues" for sale, and she was asking \$25 for each pill. Matheny advised Weatherley that he met with "Robert's" mother at Friendly's Restaurant and "Robert" arrived and told his mother to give Matheny \$80.00. Weatherley advised Matheny that she, referring to "Robert's" mother, sold the pills for \$20. Matheny and Weatherley then talked about the female having 20 pills for sale and "Robert" making a \$100 off the deal. Based on training, knowledge and experience, it is believed that William Matheny purchased 20 tablets of Oxycodone from "Robert's" mother for \$500 and "Robert" made a hundred dollars for brokering the deal, which was forwarded to Matheny. On May 23, 2013, at approximately 6:33 pm, Matheny called Weatherley. (Ref. 6247). Matheny told Weatherley that Matheny was on his way to Catonsville to get some "strips." Your affiant knows that "strips" is a street term used to describe Suboxone patches, a schedule III controlled substance.

Request for No Knock Entry: No.

Items to be recovered at the location: Law enforcement expects to find pharmaceutical and other controlled substances, related paraphernalia, related documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, vehicles, and other items more fully described in ATTACHMENT D.

¹¹ Your affiant believes this is a reference to Robert Koetzle, III, who lives at 3█ Bigley Avenue, next door to Jackie Weatherley, and who is also either employed or hangs around at Paschall's Auto. Koetzle's mother is Tina Woodland.

12. **3219 Lily Avenue, Apartment B
Baltimore, Maryland 21227**

Home of: Richard Ashbrook
DOB: 2/6/1962, white male

Description: This property is a one story home with a basement that has been converted into apartments. It has dark brownish red vertical wood siding on a white cinderblock foundation. It has a brown shingle roof. Facing the property from the street, there is an entrance to the house on the main level up steps to a porch, on the right facade and a lower level entrance on the left facade. The lower entrance is at ground level, has a brown entrance door, with black numbers "3219" on the building to the left of the door. Upon entering the building, apartment B is located downstairs to the right and it has a brown door with the letter "B" on it. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph.*

Intercepted in drug related conversations: Yes

Evidence of Participation in burglaries/robberies: Limited.

Criminal record of arrest/convictions: Yes. Richard Ashbrook has six convictions from 1989 through 2003 for Second Degree Burglary (twice) ; Burglary; possession of drugs; and Theft (twice.)

How do we know he lives there: A recent utilities check revealed that the service at 3219 Lily Avenue, Apartment B, Baltimore, Maryland 21227, is listed to Richard Rader Ashbrook Jr., since 2010. On May 24, 2013, in the afternoon, surveillance agents observed Ashbrook walking from the home across the front lawn to his blue Ford F-150 truck. This is the same truck that David Paschall, Mark Johnson and Ron Henderson were in on April 13 and 14, 2013 when they drove to Richmond and back looking for a business to burglarize, and in which Paschall and Johnson were caught with the stolen firearm. This Ford F-150, is often seen in the compound in the 800 block of Desoto Road, Baltimore, Maryland, and actually appears in the photograph behind Tab 1, above.

Additional Support to search this location: Ashbrook is a known associate of David

Paschall. Ashbrook is a drug user, who supplies Oxycodone to David Paschall and also obtains Oxycodone from Paschall as well. Between November 16, 2012 and March 5, 2013, a pen register on Paschall's telephone registered hundreds of contacts between them. On April 8, 2013 at 9:21 pm (Ref.1806) Ashbrook was intercept talking with David Paschall about his Ford F-150 truck. From the conversation your affiant understood that Ashbrook had lent it to David Paschall - who still had it the night he and Mark Johnson were arrested in it on April 14, 2013. Ashbrook advised Paschall to bring a screw driver with them because when the driver's door is opened, the light over the top of the truck bed comes on. He told them to just pop the bulb out so it wouldn't illuminate them if they were trying avoid being seen. Ashbrook said he had just wanted to let Paschall know. This is evidence that Ashbrook knew that Paschall intended to use Ashbrook's truck for an illegal endeavor. This was not the only participation by Ashbrook in these activities. On July 12, 2012, in the preliminary stages of this investigation, surveillance agents followed David Paschall in a Nissan Pathfinder (owned by Mark Johnson's brother) out of the lot at 8███ Desoto Road, south on Route 301 to Waldorf, Maryland. Paschall stopped at a gas station, and met up with three men in a blue Dodge Ram truck. In that truck was Richard Ashbrook, Ronald Henderson and Mark Johnson. Two of these men were dressed all in black, dark hoodies and black gloves. The three men got into the Pathfinder with Paschall. They drove around. Two subjects got out and walked around a credit union. It appeared they were having car trouble, and left the area. No break-ins were reported that night.

On April 25, 2013, at approximately 5:46 pm, David Paschall called Ashbrook (Ref. 1543/5463). Ashbrook told Paschall, "Give me about a half an hour. " Paschall asked, "Yeah?" Ashbrook replied, "Yeah." On that same date, at approximately 6:40 pm, Paschall received a call from Sidney Tawes (Ref. 1546/5463), one of Paschall's most consistent customers. Tawes

told Paschall, “ If you get anything tonight, give me a call.” Again, on that same date, at approximately 7:00 pm, surveillance at Paschall’s Auto, observed Ashbrook’s blue Ford pick-up truck parked on the lot at that location. It had not been there minutes earlier. At 7:02 pm, Paschall called Sidney Tawes, (Ref. 1550/5476), and advised her, “Yeah baby, I got some thirties.” Based on the above conversations, your affiant believes that Richard Ashbrook delivered a quantity of “thirties,” street term for Oxycodone to Paschall.

Request for No Knock entry: No.

Items to be recovered at the location: Law enforcement expects to find pharmaceutical and other controlled substances, related paraphernalia, related documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, stolen goods, instrumentalities and tools relating to the commercial burglaries and home invasion robberies including vehicles and firearms, and other evidence of crimes committed by this enterprise, more fully described in ATTACHMENT C.

**13. 20█ Codd Avenue
Dundalk, Maryland 21222**

Home of: Sidney Tawes
DOB: 8/27/1988, white female

Description: Described as a two story row house, with red brick on the lower part and white siding on the second story which overhangs the first level. It has a gray shingle roof, a white inner door and white storm door. Above the front door in black letters are the words, "Two thousand three." There is a white porch light to the right (facing the property) of the front door on the red brick and two attached windows to the right of the light. On the second story there are two separate dormered windows. There is a small porch surrounded by a white railing with a mail box, in white and black resembles a small building. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph.*

Intercepted in drug related conversations: Yes.

Evidence of Participation in burglaries/robberies: No.

Criminal record of arrest/convictions: No.

How do we know she lives there: On May 30, 2013, assisting law enforcement initiated surveillance at 20█ Codd Avenue, Dundalk, Maryland 21222. At that time, a Ford Focus with Maryland license plates 4AS 7315 registered to Tawes at this 2003 Codd Avenue address, arrived operated by Sidney Tawes. Tawes exited the vehicle and entered the home without hesitation. The home and utilities are not in Tawes' name.

Additional Support to search this location: On April 1, 2013, Tawes call David Paschall. (Ref. 35/55). Tawes asked Paschall, "Hey, hey you there?" Paschall replied, "Yea, where you at?" Tawes advised that she was twenty minutes away. Paschall told Tawes, "Alright, my son's here. See Chad. Okay? He's got the four 'blinkies' for ya and ah he'll take care of you." Your affiant believes that Paschall was advising Tawes that his son, Chad Paschall was at Paschall's Auto and had four 30 milligram tablets of Oxycodone, for her to purchase when she got there.

Again on April 5, 2013, at approximately 1:48 pm, Paschall received a call from Tawes, (Ref. 337/1013). Tawes asked Paschall, "Anything good?" Paschall told Tawes, that he had thirty "fifteens." Tawes said she would take all of the "fifteens." "Fifteens" is a street term used to describe 15 milligram tablets of Oxycodone. On April 5, 2013, at approximately 3:00 pm, surveillance at Paschall's Auto, captured Tawes' Ford Focus arrive at that location. Tawes stayed for only several minutes and left.

On May 6, 2013, at 5:04 pm, David Paschall called Sidney Tawes. (Ref.7760) Paschall advised Tawes that he had "one fives." She said okay and ended the call. Your affiant believes this is a reference to 15 milligram Oxycodone tablets. Within the hour, at 5:50 pm Tawes was surveilled arriving at Paschall's Auto in her Ford Focus. She left Paschall's Auto at 6:02, pm, in your affiant's opinion following the drug transaction.

Between April 1, 2013 and May 28, 2013, there were 257 telephone contacts between Tawes and David Paschall. Tawes called Paschall almost every day, if not every day. She often offered to purchase whatever quantity of drugs David Paschall had in his possession at that time. These telephone calls were rarely about any subject other than Tawes obtaining drugs. In your affiant's opinion, based upon the content and frequency of the contact, Tawes was both a drug user and a distributor of drugs on a daily basis.

Request for No Knock Entry: No.

Items to be recovered at the location: Law enforcement expects to find pharmaceutical and other controlled substances, related paraphernalia, related documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, vehicles, and other items more fully described in ATTACHMENT D.

14 . 14[REDACTED]Oakdale Avenue
Glen Burnie, Maryland 21060

Home of: James Hedges
DOB: 11/26/1968, white male

Description: Described as a single story family home, with red brick and light blue siding. It has a black shingle roof, and white front door with an oval glass window in it. There are white shutters on the double window to the right of the front door (facing property). There are gold numbers "14[REDACTED]" on a white mailbox on the red brick to the left of the front entry door. There is another multi-section casement window to the left of the front door and a garage to the left of that window. There is a small front porch and cement walkway from the driveway to the front door. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photographs.*

Intercepted in drug related conversations: Yes

Evidence of Participation in burglaries/robberies: No.

Criminal record of arrest/convictions: No

How do we know he lives there: During June, 2013, a check was initiated through online Maryland property records. According to those records, 14[REDACTED]Oakdale Road, Glen Burnie, Maryland 21060 is listed to Morris J. Hedges Sr., believed to be James Hedges' father. On June 5, 2013, a law enforcement surveillance at 14[REDACTED]Oakdale Court, Glen Burnie, Maryland. At that time, a person believed to be James Hedges was observed entering and exiting 14[REDACTED]Oakdale Court, Glen Burnie, Maryland without hesitation.

Additional Support to search this location: Based upon the interceptions, your affiant believes that Hedges is another one of David Paschall's pill suppliers. Between April 3, 2013 and May 13, 2013, the wiretap intercepted 21 calls between Paschall and Hedges. Of those 21, 15 calls were drug related. On April 7, 2013, at approximately 8:16pm, (Ref. 1503) Paschall called Hedges. In your affiant's opinion, they were arranging a drug transaction of "little ones" and "big ones." Your affiant believes that the term "little ones" described 5 milligram Percocet

tablets, and the term “ big ones” described 10 mgs Percocet tablets. Percocet is a schedule II Controlled Substance. That same day at 9:30 pm (Ref. 1521), Hedges called Paschall trying to confirm a time when Paschall could meet, at a location where they have met in the past. During this conversation, Hedges indicated that he did not want be seen by any of Paschall’s associates. At 9:48 pm (Ref. 1525) Paschall called Hedges and confirmed the location of the meeting. On April 7, 2013, at approximately 9:35pm, assisting law enforcement monitoring the parking lot at Paschall’s Auto, observed David Paschall and Jackie Weatherley enter a black Chrysler bearing Maryland tag 2CWX80, listed to Michael Paschall. Surveillance units followed the vehicle to the 900 block of Sunnybrook Drive, Pasadena, Maryland where the vehicle stopped on the right side of the road with its hazard lights blinking. A red Ford Escort with Maryland registration 6BA8071 pulled behind the Chrysler on the right side of the street at 9:54 pm. This vehicle is listed to Hedges father at 14███Oakdale Road, Glen Burnie, Maryland. David Paschall exited the driver's door of the Chrysler, walked back to the red Ford and got into the front passenger side of the vehicle. Paschall remained in the Ford for approximately three minutes, exited, and returned to the driver's seat of the Chrysler. Both vehicles then left the location. Surveillance units followed the red Ford to the parking lot of the Gatewater Landing Apartments, located at Gatewater Court. The vehicle parked in a parking space, but the driver never exited the vehicle and to the best of the surveillance units knowledge, no one met with the driver. The driver sat in his vehicle for approximately ten minutes before leaving. The vehicle was then followed to 14███Oakdale Road, Glen Burnie, Maryland. The driver recognized as James Hedges, exited the vehicle and entered 14███Oakdale Road, Glen Burnie, Maryland 21060 without hesitation.

Request for No Knock Entry: No.

Items to be recovered at the location: Law enforcement expects to find pharmaceutical and other controlled substances, related paraphernalia, related documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, vehicles, and other items more fully described in ATTACHMENT D.

**15. 39█ Glenrose Avenue
Halethorpe, Maryland 21227**

Home of: Carl Paschall, Sr.

Description: This is a one-story red brick single family home, with a light grey shingle roof and a white front door. On each side of the door there are glass block windows. There is a small porch and overhang at the front door supported by brick columns. White numbers "39█" appear on the mail box at the driveway. All the windows are trimmed in white with no shutters. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photographs.*

Intercepted in drug related conversations: No.

Evidence of Participation in burglaries/robberies: Yes

Criminal record of arrest/convictions: Yes. Convicted for a handgun violation in March 1981.

How do we know he lives there: Numerous surveillances have placed Carl Paschall Sr. at the residence located at 39█ Glenrose Avenue. Carl Paschall Sr. was arrested on September 10, 2012 for the second degree burglary at the 7-Eleven in Grantsville, Maryland where he provided investigators this address, 39█ Glenrose Avenue. Cell-site precision analysis on his cell phone, placed Carl Paschall Sr. at this location almost every night during the past year. Carl Paschall Sr. was most recently surveilled to 39█ Glenrose Avenue on June 11, 2013, and was seen entering his residence through the garage.

Additional Support to search this location: In addition to the 7-Eleven burglary in Grantsville, Maryland, Carl Paschall, Sr., has been implicated in three additional commercial burglaries, to include: The August 6, 2012 break-in at the Bedington Crossroads in Martinsburg, West Virginia; the January 21, 2013 break-in at Rivers Construction in Jessup, Maryland; and the April 21, 2013 burglary at the BP gas station in Kingsville, Maryland.

Request for No Knock Entry: No

Items to be recovered at the locations: Law enforcement expects documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, stolen goods, instrumentalities and tools relating to the commercial burglaries and home invasion robberies including vehicles and firearms, and other evidence of crimes committed by this enterprise, more fully described in ATTACHMENT B.

16. 20█ Lemmon Street
Baltimore, Maryland 21230

Location used by: Carl Paschall, Sr.
DOB: 6/25/1960, white male

Description: This is a two story building that appears to be a garage or warehouse. The first floor has a plywood entrance door at least 5 or 6 feet wide, with "20█" painted in dark green on the front of it. It is secured by a series of deadbolts and padlocks. Posted on the door is a white sign printed in black letters that says "Private property." The second story is grey stucco with one white trimmed sash window. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph.*

Intercepted in drug related conversations: No.

Evidence of Participation in burglaries/robberies: Yes

Criminal record of arrest/convictions: Yes. Convicted for a handgun violation in March 1981.

How do we know he uses this location: According to Maryland property records, Carl Paschall is the owner of 20█ Lemmon Street, Baltimore, Maryland 21223. The mailing address is 18█ Ramsay Street, Baltimore, MD 21223. A copy of the State of Maryland land Instrument Intake Sheet revealed that the name on 20█ Lemmon Street is in the name of Carl Paschall.

Additional Support to search this location: On at least one occasion, Carl Paschall, Sr., was tracked back to this location following a break-in. *See paragraph 13. j. supra.* Precision cell analysis also reflects Carl Paschall, Sr., at this location on numerous occasions during the period of this investigation, however with no pattern of regularity. In other words, he goes there to get something or put something there. It is not a place of business.

Request for No Knock entry: No.

Items to be recovered at the location: Law enforcement expects documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, stolen goods, instrumentalities and tools relating to

the commercial burglaries and home invasion robberies including vehicles and firearms, and other evidence of crimes committed by this enterprise, more fully described in ATTACHMENT B.

17. **21 ■ Gaylawn Drive**
 Baltimore, Maryland 21230

Home of: Thomas Daniel Ellis
 DOB: 9/21/1990; white male

Description: The residence is further described as a single family residence with a yellow vinyl siding exterior. The front of the residence has a white front door on the right end (facing property), and two windows to the left of the door. The windows are trimmed and shuttered in white. The residence has a white storm door on the front door. The numbers "2 ■" are located on the black mailbox in front of the residence. There are four concrete steps leading to a small landing with black railings on each side in front of the front door. There is another door on the right side of the house as well. There are white awnings above both doors. The awnings have horizontal stripes and have scalloped edges. The rear yard appears to be completely fenced in with an approximately 5 foot tall wooden fence. There is a brick chimney along the left facade rising over the roof. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph.*

Intercepted in drug related conversations: No

Evidence of Participation in burglaries/robberies: Yes.

Criminal record of arrest/convictions: Yes. One arrest in July 2012 for disorderly conduct and was arrested in September 2012 in Grantsville for the burglary of the 7-Eleven.

How do we know he lives there: Ellis has been observed at this location along with the assistance of cell-site precision analysis. Ellis has been surveilled at his home as recently as June 10, 2013 when surveillance agents observed him through the storm door at this location at 10:27 am. The gray Acura TL that Ellis has been observed driving during the course of crimes described herein, has been observed in front of this location on numerous surveillances. It is registered in his name at this Gaylawn Drive address.

Additional Support to search this location: Ellis has been previously arrested with other suspects listed within the original affidavit after committing the commercial burglary at the 7-Eleven in Grantsville, Maryland on September 10, 2012. Ellis has been observed on numerous

surveillances "scouting" out target locations for burglaries while operating his gray Acura TL. Ellis was observed by law enforcement detectives, breaking and entering into a BP Gas Station in Kingsville, Maryland on April 20, 2013. During this burglary, Ellis and the other suspects pried open an ATM machine, stealing the United States Currency within along with numerous cartons of various cigarettes.

Request for No Knock entry: No.

Items to be recovered at the location: Law enforcement expects documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, stolen goods, instrumentalities and tools relating to the commercial burglaries and home invasion robberies including vehicles and firearms, and other evidence of crimes committed by this enterprise, more fully described in ATTACHMENT B.

18. **35■ Clover Avenue**
Baltimore, Maryland 21227

Home of: Tina Marie Woodland
DOB: 12/13/1964, white female

Description: This is a red brick single family home. It has white trim and a red asphalt roof. There is a dark front door and a white storm door. The numbers "35■" are attached to the mailbox at the street toward the left side of the property. At least a half dozen steps lead from left to right (facing home) up to a front porch. The porch is enclosed with white railings. There is a white porch light to the left of the entrance door and a window trimmed in white on either side of the door. Above the door is a double window also trimmed in white. On the right side of the home there is a garage with red siding, white trim, white garage door, white standard door, and a light grey asphalt shingle roof. A chain link fence begins at the right side of the garage, that surrounds the side yard and continues around the back yard of the property. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photographs.*

Intercepted in drug related conversations: No.

Evidence of Participation in burglaries/robberies: Yes.

Criminal record of arrest/convictions: No.

How do we know she lives there: A recent utilities check revealed that the service at 35■ Clover Avenue, Baltimore, Maryland 21227 is in the name of Tina Woodland and Robert Lee Koetzle, since 2011. Woodland's current Maryland driver's license reflects this address as her residence.

Additional Support to search this location: Two different surveillances, June 11 and 13, 2013, placed Carl Paschall, Sr., at that location entering and leaving using keys to unlock and lock the front door. On the latter occasion Paschall exited, locked the door, started to walk away, turned around, returned to the door, unlocked it, entered, and came back out carrying a white plastic bag. He then relocked the door with keys and left. Tina Woodland was observed in Carl Paschall, Sr.'s vehicle immediately following the March 31, 2013, burglary at the

Kingsville BP, when they stopped at a nearby Royal Farms store and Paschall and Ellis were observed to exchange a congratulatory “High Five.” Her vehicle was also spotted, at April 21, 2013 location of the break-in at Brantwood Liquors in Elkton, Maryland being driven by someone fitting her description. It is your affiant’s opinion, based upon the way this group operates and the surveillances of Woodland at Brantwood Liquors and the Kingsville BP, that she was participating as the lookout and/or the getaway driver.

Request for No Knock Entry: No.

Items to be recovered at the location: Law enforcement expects documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, stolen goods, instrumentalities and tools relating to the commercial burglaries and home invasion robberies including vehicles and firearms, and other evidence of crimes committed by this enterprise, more fully described in ATTACHMENT B.

19. **261 Hollins Ferry Road**
 Baltimore, Maryland 21230

Home of: Carl Parrish Paschall, Jr.
 DOB: 4/20/1982; white male

Carl Paschall, Jr., has two convictions for Theft, and one for Second Degree Burglary, all between 2003 and 2007.

20. **261 Hollins Ferry Road**
 Baltimore, Maryland 21230

Home of : Mark Richard Johnson (& Dawn Foerster)
 DOB: 4/4/1962; white male

Mark Johnson has been convicted three times for Burglarly, three times for storehouse breaking, twice for rogue and vagabond, and twice for theft, all since 1981.

Description: These two locations, 261 and 261 Hollins Ferry Road, are one half of a three story duplex. It sits atop a hill with a retaining wall along the street. There are four boarded up windows along the bottom or basement level, four single sash windows along the second or main level, and four along the top or third level. It is grey stucco and has greyish blue siding with grey trim and a black asphalt roof over main floor windows. The building has a parapet with a flat roof. There is a driveway to the right of the property which starts at the street of the residence next door. It winds toward 261 and then goes along the property and behind. There is a chain link fence, and a detached shed with tan or white siding, white trim and a white garage door. Facing the building, the left side is 251; the right side is 261. Flanking each side of the structure are concrete or stone steps that go up from the street level to the side of the lowest level of the house. There is another set of steps from that level to the entrance door on the second or main level. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photographs.*

261 Hollins Ferry Road, Baltimore, Maryland: At the top of the lower steps to the home on the left side there is a chain link fence. There is a black mail box with the numbers "261" on it in white, to the left of the chain link gate. Once up the second level steps, 261 has a gray entrance door and a white storm door on the side of the house.

261 Hollins Ferry Road, Baltimore, Maryland: At the top of both sets of steps on the right side the entrance door has a window trimmed in white and divided into six panes. The numbers "261" are located on the door below the window and above a black mailbox.

Intercepted in drug related conversations: Neither

Evidence of Participation in burglaries/robberies: Both - Yes.

How do we know Carl Paschall, Jr. lives at 26[REDACTED] The title owner of this property is Carl Paschall Jr. Carl Paschall Jr. has been observed entering and exiting this residence by surveillance teams as recently as June 5, 2013. Cell site precision analysis on his cell phone also places him at the residence of 26[REDACTED] Hollins Ferry Road on an almost daily basis. Carl Paschall Jr. was arrested on September 10, 2012 for second degree burglary in Grantsville, Maryland by the Maryland State Police. Carl Paschall Jr. provided his address as 26[REDACTED] Hollins Ferry Road following the arrest. An Acura TL operated by Carl Paschall Jr. has been observed at the address as well.

How do we know Mark Johnson lives at 2627? On April 10, 2011, local police responded to this location and arrested Mark Johnson for assaulting Dawn Foerster, the women with whom he lives. The assault happened at that location. Johnson still lives there with Foerster. On May 7, 2013, David Paschall called Foerster's cell phone looking for Johnson. She advised he was still asleep. On June 3, 2013, Johnson was arrested for an assault (hit a man on the head with a hammer two days earlier) next door at 26[REDACTED] Hollins Ferry Road, location #19, next door to location #20, where they found him.

Additional Support to search both locations #19 and #20: In addition to the criminal events described herein participated in by both Carl Paschall, Jr., and Mark Johnson, reference is made to the attached aerial photograph. Both locations are marked. Behind these houses, and behind the yards behind the houses, is a wooded area. It is triangular, one side is bordered by a business - a large long building; and the other side is bordered by railroad tracks. Three safes lying along the rail road tracks were recovered and were determined to be stolen on November 24, 2012, in commercial burglary at Steel & Wire Products Company, in Baltimore, Maryland

21230. One of the three firearms stolen that night was also recovered from Mark Johnson and David Paschall who were in Richard Ashbrook's truck. Prior to the spring when the vegetation was less intense, agents were able to observe that inside of the wooded area are safes, pieces of safes, ATMs and pieces of ATMS. There even appears from the aerial to be a work station in the middle of the woods. Your affiant believes that this is a dumping ground for evidence related to the crimes described herein. Because of the dense vegetation and the uncertainty of the property lines, an extensive search of the area has not yet been conducted. There is probable cause to believe that within these homes, in their yards and around their homes, there is evidence related to this ongoing criminal enterprise.

Request for No Knock entry: No

Items to be recovered at both locations: Law enforcement expects documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, stolen goods, instrumentalities and tools relating to the commercial burglaries and home invasion robberies including vehicles and firearms, and other evidence of crimes committed by this enterprise, more fully described in ATTACHMENT B.

21. 7■■■211th Street
Pasadena, Maryland 21122

Home of: Ronald Henderson
DOB: 6/20/1962, white male

Description: This residence is a split foyer single family home with red brick, and white siding on the second level. The windows on both levels are trimmed in white with blue shutters. The door is blue and there is a white storm door. The area around the door including the second level is brick. There is a small porch at the front door. To the right of the front door are black numbers "7■■■" on the white siding. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

Intercepted in drug related conversations: No.

Evidence of Participation in burglaries/robberies: Yes.

Criminal record of arrest/convictions: Henderson has been convicted six times since 1981, for armed robbery twice, burglary 4 times, and a handgun violation.

How do we know he lives there: A recent utilities check revealed that the service at this address since 2008, is in the name of Rebecca L. Henderson believed to be Henderson's mother. A recent interview with a person who wishes to remain anonymous for fear of retaliation, confirmed that Henderson lives in this house with family members. On June 18, 2013, agents conducting surveillance at this location at approximately 2:42 pm, saw an inner door open and then observed Ronald Henderson staring outside through the glass storm door.

Additional Support to search this location: The evidence described herein places Henderson in one of the Paschall crews committing commercial burglaries. He was identified committing a burglary on March 3, 2012 in Virginia, from which silver bars were stolen and pawned in Anne Arundel County by a person who lives in this home with him; purchasing burner telephones in Glen Burnie used in a burglary of a credit union in Ruckersville, Virginia on April 8, 2012; casing a credit union on July 12, 2012 with Mark Johnson, Richard Ashbrook

and David Paschall; and was out casing locations on April 13, 2013 in Richmond with David Paschall and Mark Johnson. There is every reason to believe that in his home are instrumentalities of these crimes (gloves, masks, etc.) and items taken from these burglaries, including items brought across state lines.

Request for No Knock Entry: No.

Items to be recovered at the location: Law enforcement expects documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, stolen goods, instrumentalities and tools relating to the commercial burglaries and home invasion robberies including vehicles and firearms, and other evidence of crimes committed by this enterprise, more fully described in ATTACHMENT B.

IV. CONCLUSION.

Attached hereto following this affidavit, are the three Attachments referenced herein. In summary they are as follows:

ATTACHMENT A: Includes a detailed description of locations 1 -21.

ATTACHMENT B: Details the items law enforcement expects to find to include documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, stolen goods, instrumentalities and tools relating to the commercial burglaries and home invasion robberies including vehicles and firearms, and other evidence of crimes committed by this enterprise. (Locations 15, 16, 17, 18, 19, 20, and 21.)

ATTACHMENT C: Details the items law enforcement expects to find to include pharmaceutical and other controlled substances, related paraphernalia, related documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, stolen goods, instrumentalities and tools relating to the commercial burglaries and home invasion robberies including vehicles and firearms, and other evidence of crimes committed by this enterprise. (Locations # 1, 3, 4, 5, 6, and 12.)

ATTACHMENT D: Details the items law enforcement expects to find to include pharmaceutical and other controlled substances, related paraphernalia, related documents and records reflecting the operation of the criminal enterprise described herein, and identifying members and other associates, money, assets, vehicles. (Locations # 2, 7, 8, 9, 10, 11 13 and 14.)

ATTACHMENT E: Is a chart with all 21 racketeering acts, whether the events involved the theft or destruction of an ATM or contents, or a financial institution. This is relevant to

violations under Title 18, United States Code, § 2113 (Bank Larceny). This chart also reflects which instances involved the Interstate Transportation of Stolen Property, a violation of Title 18, United States Code, § 2314.

ATTACHMENT F: Is a chart with all of the targets and the locations (1 - 21) related to each of them. The chart then indicates on which pages of this affidavit the drug activity is described. Finally, this chart indicates for each target, the other racketeering activity that is described herein.

Based upon the evidence presented herein, your affiant believes there is evidence, more fully described herein, reflecting that the above-described persons are committing and conspiring to commit violations of federal and state narcotics laws (21 U.S.C. § 841 *et seq*). Moreover, these persons described herein, and others, are participating and conspiring to participate in a racketeering enterprise, 18 U.S.C. § 1962(d), to include violations of 18 U.S.C. § 922(g) (Prohibited persons possessing firearms); 18 U.S.C. § 1956, *et seq* (laundering monetary instruments); 18 U.S.C. § 1959 (Violent crimes in aid of racketeering activity); 18 U.S.C. § 2113 (Bank Larceny); 18 U.S.C. § 2314 (Interstate Transportation of Stolen Goods); 18 U.S.C. § 1952 (Interstate transportation in aid of racketeering enterprises) and other enumerated crimes in 18 U.S.C. § 1961.

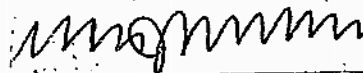
13-1630 - TJS through 13-1650 - TJS

Your affiant submits that evidence of these crimes will be located within the locations described herein.



Glenn J. Hester
Task Force Officer
Drug Enforcement Administration

Subscribed and sworn before me this 11th day of July, 2013.



Timothy J. Sullivan,
United States Magistrate Judge
District of Maryland

ATTACHMENT A

1. **801 Desoto Road**
Baltimore, Maryland 21223

Description: These three businesses, **locations #1, 2 and 3** are in a cul-de-sac which forms a protective compound around them. The 800 block of Desoto Road divides the 2900 and 3000 blocks of Wilkens Avenue. When crossing Wilkens Avenue, leaving the 900 block and entering the 800 block of DeSoto Road, the street makes a dog leg right and then left into what is more like a parking lot than a street. A building on the right houses **8█ Desoto Road, location #1**. On the left, is **8█ Desoto Road, location #3**, and then **8█ Desoto Road, location #2**, is further into the dead end, also on the left. A chain link fence can be closed to block the entire 800 block of Desoto Road. The "end" of the street is blocked by a chain link fence that runs from the far side of **8█ Desoto Road** on the left, across the end of the "street" up to the far side of **8█ Desoto Road**, enclosing the area. The area is filled with cars, trucks, boats, shipping containers, tires, dumpsters and other debris. There is only one way in and one way out of this block. *See attached aerial photograph(s).*

8█ Desoto Road, Baltimore, Maryland, location #1 is the business known as Paschall's Auto - an auto repair shop. This is an off-white painted two story stand alone building containing an office and work bays used as an automotive garage. There is an office located on the second floor. The front of the business has five brown garage doors and an aluminum covered entry door. The building has a parking area secured by a metal fence within the fenced in area of the entire compound. There are surveillance cameras on the outside of the building trained on the front lot. Behind **8█ Desoto** is a green shed. To access the shed, instead of making the left into the 800 block of Desoto when approaching from Wilkens Avenue proceed straight into an alley that runs behind the row houses in the 3000 block of Desoto Road. *(The shed is visible in the aerial.)* Along that alley is a continuation of the debris, shipping containers, cars, etc from the business at **8█ Desoto Road**. Parts of that area behind **8█ Desoto Road** are fenced in and include the shed, the only structure behind **8█ Desoto Road**. In addition to some fencing, the area is surrounded by woods. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

2. **8█ Desoto Road**
 Baltimore, Maryland 21223

Description: These three businesses, locations #1, 2 and 3 are in a cul-de-sac which forms a protective compound around them. The 800 block of Desoto Road divides the 2900 and 3000 blocks of Wilkens Avenue. When crossing Wilkens Avenue, leaving the 900 block and entering the 800 block of DeSoto Road, the street makes a dog leg right and then left into what is more like a parking lot than a street. A building on the right houses 8█ Desoto Road, location #1. On the left, is 8█ Desoto Road, location #3, and then 8█ Desoto Road, location #2, is further into the dead end, also on the left. A chain link fence can be closed to block the entire 800 block of Desoto Road. The "end" of the street is blocked by a chain link fence that runs from the far side of 8█ Desoto Road on the left, across the end of the "street" up to the far side of 8█ Desoto Road, enclosing the area. The area is filled with cars, trucks, boats, shipping containers, tires, dumpsters and other debris. There is only one way in and one way out of this block. *See attached aerial photograph(s).*

8█ Desoto Road, Baltimore, Maryland, location #2, is the business known as Patriot Fire Stop - a fire restoration business. This location is one of three businesses contained in a white painted cinder block building on the left hand side of the 800 block of Desoto Road when driving into the area. Facing these three businesses, this location toward the right. There is a brown metal door with the numbers "8█" horizontally on a square plaque to the right of the door. There is a metal grate covering the window to the right of the door and there are security cameras on the front of the building. There is chain link fencing surrounding a portion of the front parking area in front of the building. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

3. **8█ Desoto Road**
 Baltimore, Maryland 21223

Description: These three businesses, locations #1, 2 and 3 are in a cul-de-sac which forms a protective compound around them. The 800 block of Desoto Road divides the 2900 and 3000 blocks of Wilkens Avenue. When crossing Wilkens Avenue, leaving the 900 block and entering the 800 block of DeSoto Road, the street makes a dog leg right and then left into what is more like a parking lot than a street. A building on the right houses 8█ Desoto Road, location #1. On the left, is 8█ Desoto Road, location #3, and then 8█ Desoto Road, location #2, is further into the dead end, also on the left.

A chain link fence can be closed to block the entire 800 block of Desoto Road. The "end" of the street is blocked by a chain link fence that runs from the far side of 8█ Desoto Road on the left, across the end of the "street" up to the far side of 8█ Desoto Road, enclosing the area. The area is filled with cars, trucks, boats, shipping containers, tires, dumpsters and other debris. There is only one way in and one way out of this block. *See attached aerial photograph(s).*

8█ Desoto Road, Baltimore, Maryland, location #3, is the business known as Supreme Auto Glass. This location is one of three businesses contained in a white painted cinder block building on the left hand side of the 800 block of Desoto Road when driving into the area. Facing these three businesses, this location is on the far left, or closest to Wilkens Avenue and is directly across from 8█ Desoto Road. There is a brown metal door with the numbers "8█" vertically on a square plaque to the left of the door. Across the facade of the entire building between, there are several grated windows and loading docks with garage type doors. Without being inside it cannot be known which windows and which loading docks go with each location. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

4. 7█ Meadowbrook Avenue,
Catonsville, Maryland 21228

Description: Described as a two story duplex (facing property - the right side), with tan-light brown siding, shingle roof, white front entry door. On both sides and along the top of the door are small window panes. There is a porch with a white railing, and a porch light affixed to the gray siding to the right of the front door. The numbers "7█" in gold, are attached to the front porch support pole on the right side of the 7 or so steps up from the front yard. The front yard is very small with a telephone pole no less than 5 feet in front of the steps up to the porch. All windows are trimmed in white and there are no shutters. The back yard is fenced in by a wood privacy fence. The shingles on rear portion of the roof are in three different colors. The house is located in Catonsville, Maryland 21228. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

5. **16■■ Inverness Avenue**
Baltimore, Maryland 21230

Description: The residence is further described as a two story rowhouse with red, brick siding. The residence has a brown front door with white molding surrounding the exterior door. There is a chain link fence approximately 3-4 feet high around the front yard of the residence. A sidewalk leads to 2-3 steps and a front, covered porch with a white railing. The porch covering is a light brown or tan colored material with horizontal lines in it and it is trimmed in a white scalloped edge. There are two white columns that support the front of the porch overhang, and "16■■" is displayed vertically in dark numbers going down the right column. There is a double sashed window to the right of the front door and another window on the second level on the right portion of the rowhouse with an awning that matches the material of the front porch covering. There is a black mailbox on the red brick to the right (facing the property) of the entrance door. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

6. **19■■ Grinnalds Avenue**
Baltimore, Maryland 21230

Description: 19■■ Grinnalds Avenue, is a two story brick rowhouse with a white security door with vertical metal or iron strips, and a dark inner door. A mailbox is located to the left (facing the property) of the door. Yellow and white awnings top the second floor windows. Above the front door is a transom with stained glass containing the numbers "19■■" There is a shared covered porch with the rowhome to the right. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

7. **3■■ Bigley Avenue**
Lansdowne, Maryland 21227

Description: The residence is further described as a two story red brick row house with blue/gray siding, a gray shingle roof, and a white storm door. The numbers "3■■" run vertically along the wooden porch support pole. There is a wood slatted fence edging

the front yard. A green mailbox can be seen prominently over the top of the fence in front. This property is in Landsdowne, Maryland. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

8. **10[REDACTED] 7th Street**
 Glen Burnie, Maryland 21060

Description: The residence is further described as a two story split foyer single family home, with light grayish blue siding, and a light gray shingle roof. There is a dark wooden front door, a white screen door, and all of the windows are trimmed in with black shutters. The numbers "10[REDACTED]" in black are visible on mailbox at the chain link fence that separates the front yard from the drive way. The numbers also appear on the right facade (facing the property) which is the driveway side of the residence. This house is located in Glen Burnie, Maryland 21060. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

9. **35[REDACTED] Horton Avenue**
 Baltimore, Maryland 21225

Description: This residence is further described as a two story brick row house with a basement. Across the first floor (right to left facing property) is an entrance door and two windows all trimmed in white. There is a porch outside of the front entrance door and the first window to the left of the door, with an overhang. There are concrete steps, at least 10 of them, leading up to the porch. The numbers "35[REDACTED]" appear on the upper center of the white house door behind a white framed storm door. The rowhouse to the right of this property has the numbers "35[REDACTED]" on the white pillar holding up the shared porch overhang. This location has a porch light and mailbox to the left of the entrance door on the red brick. There are two windows on the second story, one smaller to the right. There is one basement window on the left front to the left of the porch. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

10. 21■■ Whistler Avenue
Baltimore, Maryland 21230

Description: Described as a two story red brick row house, with a gray shingle roof, a white inner door, and a white storm door. Black numbers "21■■" appear to the left of the front entry door on formstone surrounding the front door. The numbers run diagonally down to the right. To the left of the numbers on the red brick is a white mailbox. There are at least 8 or more concrete steps from the street level to a landing which contains the yard, and 4 or 5 brick steps from the landing up to the front door. There is one double window on the second story on the left (facing property) and a double window on the first floor immediately below the second story windows. There is a gable on the roof between this house and the house to the right. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

11. 5■■ Carlsbad Court
Lansdowne, Maryland 21227

Description: Described as a two- story red brick row house with white siding, a red inner door and a white or tan storm door. It is the end of the row, on the left (facing the property). Black numbers "5■■" appear on a mailbox post inside a fence surrounding the front yard. There are three connected windows on the first floor to the left of the front door, and three windows immediately above on the second floor. There is a light immediately over the front door on the red brick. The front of the house has a white picket type fence surrounding the yard. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

12. 32█ Lily Avenue, Apartment B
Baltimore, Maryland 21227

Description: This property is a one story home with a basement that has been converted into apartments. It has dark brownish red vertical wood siding on a white cinderblock foundation. It has a brown shingle roof. Facing the property from the street, there is an entrance to the house on the main level up steps to a porch, on the right facade and a lower level entrance on the left facade. The lower entrance is at ground level, has a brown entrance door, with black numbers "32█" on the building to the left of the door. Upon entering the building, apartment B is located downstairs to the right and it has a brown door with the letter "B" on it. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

13. 20█ Codd Avenue
Dundalk, Maryland 21222

Description: Described as a two story row house, with red brick on the lower part and white siding on the second story which overhangs the first level. It has a gray shingle roof, a white inner door and white storm door. Above the front door in black letters are the words, "Two thousand █" There is a white porch light to the right (facing the property) of the front door on the red brick and two attached windows to the right of the light. On the second story there are two separate dormered windows. There is a small porch surrounded by a white railing with a mail box, in white and black resembles a small building. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

14. 14█ Oakdale Avenue
Glen Burnie, Maryland 21060

Description: Described as a single story family home, with red brick and light blue siding. It has a black shingle roof, and white front door with an oval glass window in it. There are white shutters on the double window to the right of the front door (facing property). There are gold numbers "14█" on a white mailbox on the red brick to the left

of the front entry door. There is another multi-section casement window to the left of the front door and a garage to the left of that window. There is a small front porch and cement walkway from the driveway to the front door. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

**15. 39█ Glenrose Avenue
Halethorpe, Maryland 21227**

Description: This is a one-story red brick single family home, with a light grey shingle roof and a white front door. On each side of the door there are glass block windows. There is a small porch and overhang at the front door supported by brick columns. White numbers "39█" appear on the mail box at the driveway. All the windows are trimmed in white with no shutters. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

**16. 20█ Lemmon Street
Baltimore, Maryland 21230**

Description: This is a two story building that appears to be a garage or warehouse. The first floor has a plywood entrance door at least 5 or 6 feet wide, with "20█" painted in dark green on the front of it. It is secured by a series of deadbolts and padlocks. Posted on the door is a white sign printed in black letters that says "Private property." The second story is grey stucco with one white trimmed sash window. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

17. 21■■ Gaylawn Drive
Baltimore, Maryland 21230

Description: The residence is further described as a single family residence with a yellow vinyl siding exterior. The front of the residence has a white front door on the right end (facing property), and two windows to the left of the door. The windows are trimmed and shuttered in white. The residence has a white storm door on the front door. The numbers "2100" are located on the black mailbox in front of the residence. There are four concrete steps leading to a small landing with black railings on each side in front of the front door. There is another door on the right side of the house as well. There are white awnings above both doors. The awnings have horizontal stripes and have scalloped edges. The rear yard appears to be completely fenced in with an approximately 5 foot tall wooden fence. There is a brick chimney along the left facade rising over the roof. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

18. 35■■ Clover Avenue
Baltimore, Maryland 21227

Description: This is a red brick single family home. It has white trim and a red asphalt roof. There is a dark front door and a white storm door. The numbers "35■■" are attached to the mailbox at the street toward the left side of the property. At least a half dozen step lead from left to right (facing home) up to a front porch. The porch is enclosed with white railings. There is a white porch light to the left of the entrance door and a window trimmed in white on either side of the door. Above the door is a double window also trimmed in white. On the right side of the home there is garage with red siding, white trim, white garage door, white standard door, and a light grey asphalt shingle roof. A chain link fence begins at the right side of the garage, that surrounds the side yard and continues around the back yard of the property. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

19. **26[REDACTED] Hollins Ferry Road**
 Baltimore, Maryland 21230

Description: These two locations, 26[REDACTED] and 26[REDACTED] Hollins Ferry Road, are one half of a three story duplex. It sits atop a hill with a retaining wall along the street. There are four boarded up windows along the bottom or basement level, four single sash windows along the second or main level, and four along the top or third level. It is grey stucco and has greyish blue siding with grey trim and a black asphalt roof over main floor windows. The building has a parapet with a flat roof. There is a driveway to the right of the property which starts at the street of the residence next door. It winds toward 26[REDACTED] and then goes along the property and behind. There is a chain link fence, and a detached shed with tan or white siding, white trim and a white garage door. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. Facing the building, the left side is 25[REDACTED]; the right side is 261[REDACTED]. Flanking each side of the structure are concrete or stone steps that go up from the street level to the side of the lowest level of the house. There is another set of steps from that level to the entrance door on the second or main level. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached aerial photograph(s).*

26[REDACTED] Hollins Ferry Road, Baltimore, Maryland: At the top of the lower steps to the home on the left side there is a chain link fence. There is a black mail box with the numbers "26[REDACTED]" on it in white, to the left of the chain link gate. Once up the second level steps, 26[REDACTED] has a gray entrance door and a white storm door on the side of the house. *See attached photograph(s).*

20. **26[REDACTED] Hollins Ferry Road**
 Baltimore, Maryland 21230

Description: These two locations, 26[REDACTED] and 26[REDACTED] Hollins Ferry Road, are one half of a three story duplex. It sits atop a hill with a retaining wall along the street. There are four boarded up windows along the bottom or basement level, four single sash windows along the second or main level, and four along the top or third level. It is grey stucco and has greyish blue siding with grey trim and a black asphalt roof over main floor windows. The building has a parapet with a flat roof. There is a driveway to the right of the property which starts at the street of the residence next door. It winds toward 26[REDACTED] and then goes along the property and behind. There is a chain link fence, and a detached

shed with tan or white siding, white trim and a white garage door. This warrant includes the surrounding yard and curtilage. Facing the building, the left side is 25[REDACTED]; the right side is 26[REDACTED]. Flanking each side of the structure are concrete or stone steps that go up from the street level to the side of the lowest level of the house. There is another set of steps from that level to the entrance door on the second or main level. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached aerial photograph(s).*

26[REDACTED] Hollins Ferry Road, Baltimore, Maryland: At the top of both sets of steps on the right side the entrance door has a window trimmed in white and divided into six panes. The numbers "26[REDACTED]" are located on the door below the window and above a black mailbox. *See attached photograph(s).*

**21. 7[REDACTED] 211th Street
Pasadena, Maryland 21122**

Description: This residence is a split foyer single family home with red brick, and white siding on the second level. The windows on both levels are trimmed in white with blue shutters. The door is blue and there is a white storm door. The area around the door including the second level is brick. There is a small porch at the front door. To the right of the front door are black numbers "7[REDACTED]" on the white siding. This warrant includes the surrounding yard, curtilage, sheds, garages and any other structure related to the property. *See attached photograph(s).*

ATTACHMENT B

(Items to be Seized from Locations #15, 16, 17, 18, 19, 20 and 21.)

The Subject Locations shall be searched for:

1. Any and all burglary tools to include chop saws, grinders, saw blades, crow bars, pry bars, vise grips, pliers, screwdrivers, flashlights, bolt cutters, sledge hammers, axes, chisels, punches wire cutters, tool bags, and all other tools used to accomplish illegal entry into a premises;
2. Any and all safes, and pieces of safes to include dials, hinges, doors, compartments; and any and all Automated Teller Machines, to include internal boxes, electronics, or other parts.
3. Stolen property to include lottery tickets; money orders; cartons of cigarettes; jewelry; and other valuables; Any and all alarm and video surveillance equipment to include tape devices, DVRs and other components;
4. Communication devices to include cell phones, cell phone batteries; cell phone accessories; police scanners; two-way portable radios; and walkie-talkies;
5. Maps, GPS devices; notes and documents containing information about commercial establishments;
6. Ski masks, gloves, coveralls, jumpsuits; black sweatpants and sweatshirts; back packs;
7. Books, records, personal digital assistants, cell phones, flash media, electronic storage media, lap tops, personal computers, notebooks, ledgers, personal papers and documents, which may reflect names, addresses and/or telephone numbers of their associates in their racketeering enterprise activities;
8. Photographs;
9. Records of financial transactions, including bank deposit slips, bank accounts, check ledgers and bank cards;
10. All books, records, bank statements, canceled checks, deposit tickets, financial statements, correspondence and other pertinent documents furnished by or on behalf of the listed individuals indicating the individuals might have a financial interest;
11. Documents that refer or relate in any way to financial institutions, investment or bank accounts, and credit/debit card accounts;

12. Documents that refer or relate in any way to assets such as but not limited to vehicles, real estate, precious metals, etc purchased by or on behalf of the listed individuals;
13. Currency or currency equivalents;
14. Indicia of occupancy, residency, and/or ownership of premises, including telephone and utility bills, cancelled envelopes, and keys; and
15. Firearms and other weapons.

ATTACHMENT C

(Items to be Seized from Locations #1, 3, 4, 5, 6, and 12.)

The Subject Locations shall be searched for:

1. Any and all Controlled substances, to include Oxycodone, Oxycontin, Percocet, Xanax, Methadone, related pills, heroin, cocaine, and prescription medications;
2. Paraphernalia related to obtaining and distributing any and all controlled substances to include, prescription bottles, prescription labels, blank and written prescriptions, presses, forged prescriptions, practice sheets, physician information, prescription receipts/invoices, appointment books, calendars, books showing physician visits, insurance information, insurance cards, statements, pill crushers, pill presses, prescription paper, pads, any pharmacy information, pharmacy receipts, as well as paraphernalia used in the manufacture, preparation, packaging, or weighing of illegal narcotics in preparation for distribution;
3. Books, records, personal digital assistants, cell phones, flash media, electronic storage media, lap tops, personal computers, notebooks, ledgers, personal papers and documents, which may reflect names, addresses and/or telephone numbers of their associates in their drug trafficking activities and/or templates and other documents used for forged prescriptions and methods of obtaining controlled substances;
4. Photographs;
5. Records of financial transactions, including bank deposit slips, bank accounts, check ledgers and bank cards;
6. All books, records, bank statements, canceled checks, deposit tickets, financial statements, correspondence and other pertinent documents furnished by or on behalf of the listed individuals indicating the individuals might have a financial interest;
7. Documents that refer or relate in any way to financial institutions, investment or bank accounts, and credit/debit card accounts;
8. Documents that refer or relate in any way to assets such as but not limited to vehicles, real estate, precious metals, etc purchased by or on behalf of the listed individuals;
9. Records of shipments of controlled substances;
10. Currency or currency equivalents;

11. Any and all burglary tools to include chop saws, grinders, saw blades, crow bars, pry bars, vise grips, pliers, screwdrivers, flashlights, bolt cutters, sledge hammers, axes, chisels, punches wire cutters, tool bags, and all other tools used to accomplish illegal entry into a premises;
12. Any and all safes, and pieces of safes to include dials, hinges, doors, compartments; and any and all Automated Teller Machines, to include internal boxes, electronics, or other parts.
13. Stolen property to include lottery tickets; money orders; cartons of cigarettes; jewelry; and other valuables;
14. Any and all alarm and video surveillance equipment to include tape devices, DVRs and other components;
15. Communication devices to include cell phones, cell phone batteries; cell phone accessories; police scanners; two-way portable radios; and walkie-talkies;
16. Maps, GPS devices; notes and documents containing information about commercial establishments;
17. Ski masks, gloves, coveralls, jumpsuits; black sweatpants and sweatshirts; back packs;
18. Indicia of occupancy, residency, and/or ownership of premises, including telephone and utility bills, cancelled envelopes, and keys; and
19. Firearms and other weapons.

ATTACHMENT D

(Items to be Seized from Locations #2, 7, 8, 9, 10, 11, 13 and 14.)

The Subject Locations shall be searched for:

1. Any and all Controlled substances, to include Oxycodone, Oxycontin, Percocet, Xanax, Methadone, related pills, heroin, cocaine, and prescription medications;
2. Paraphernalia related to obtaining and distributing any and all controlled substances to include, prescription bottles, prescription labels, blank and written prescriptions, presses, forged prescriptions, practice sheets, physician information, prescription receipts/invoices, appointment books, calendars, books showing physician visits, insurance information, insurance cards, statements, pill crushers, pill presses, prescription paper, pads, any pharmacy information, pharmacy receipts, as well as paraphernalia used in the manufacture, preparation, packaging, or weighing of illegal narcotics in preparation for distribution;
3. Books, records, personal digital assistants, cell phones, flash media, electronic storage media, lap tops, personal computers, notebooks, ledgers, personal papers and documents, which may reflect names, addresses and/or telephone numbers of their associates in their drug trafficking activities and/or templates and other documents used for forged prescriptions and methods of obtaining controlled substances;
4. Photographs;
5. Records of financial transactions, including bank deposit slips, bank accounts, check ledgers and bank cards;
6. All books, records, bank statements, canceled checks, deposit tickets, financial statements, correspondence and other pertinent documents furnished by or on behalf of the listed individuals indicating the individuals might have a financial interest;
7. Documents that refer or relate in any way to financial institutions, investment or bank accounts, and credit/debit card accounts;
8. Documents that refer or relate in any way to assets such as but not limited to vehicles, real estate, precious metals, etc purchased by or on behalf of the listed individuals;
9. Records of shipments of controlled substances;
10. Currency or currency equivalents;

11. Indicia of occupancy, residency, and/or ownership of premises, including telephone and utility bills, cancelled envelopes, and keys; and
12. Firearms and other weapons.

ATTACHMENT E

#	Date and Event	ATM stolen/destroyed; or financial institution	Interstate Trans. Stolen Prop.
a	9/18/11 - gas station; Madison, Va	ATM	
b	1/31/12 - home invasion; Greenbelt, Md	no	no
c	3/3/12 - gas station; Front Royal, Va	no	yes - silver bars
d	4/8/12 - credit union; Ruckersville, Va	yes - credit union.	yes - saw
e	5/26/12 - mart; Harpers Ferry, WV	ATM	yes - safe
f	5/27/12 - mart; Winchester, Va	ATM	yes - stolen van
g	5/27/12 - restaurant; Martinsburg, WV	no	yes - safe
h	6/1/12 - van arson in Maryland	no	yes: Van and 2 safes from: e, f, g.
i	8/4/12 - home invasion; Glen Burnie, Md	no	no
j	8/6/12 - mart; Martinsburg, WV	ATM	presumed
k	9/10/12 - 7-11; Grantsville, MD	ATM	no
l	11/24/12 - Construction Co; Baltimore, Md	no	no (3 guns/safes)
m	1/20/13 - Construction Co; Jessup, Md	no	no
n	3/4/13 - home invasion; Kingsville, Md	no	no (gun)
o	3/4/13 - Brantwood Liquors; Elkton, Md	no	no
p	4/13/13 - casing - Richmond, Va. - gun arrest	no	yes - gun from l.
q	4/19/13 - casing - York, Pa.	no	yes
r	4/21/13 - gas station - Kingsville, Md	ATM	no
s	5/17/13 - gas station - Finksburg, Md.	no	no
t	6/17/13 - junk yard - Baltimore, Md.	no	no
p64	7/12/12 - casing credit union - Waldorf, Md.	no	no

ATTACHMENT F

Target	Loc. #	Drug Activity	Break-in, etc.
David Paschall	1, 4	pps. 9-16; 69	a, b, d, i, l, n, p, s, t, and pg 64.
Joseph Delawder	2	pps. 9; 33.	no evidence of involvement
William Matheny	3, 11	pps. 9; 13-16; 33-35; 60-62.	Pg 37; a CS reported seeing stolen goods at location #3.
Chad Paschall	1, 5,	pps. 9-11.	j, k, s, and t.
Michael Paschall	1, 6	pps. 9-12; 17; 37-39; 46-47.	i, and n.
Jackie Weatherley	7, 8	pps. 9-16; 38;49-51; 52-54; 60-62; 69.	possibly b and i.
Michael Terry	9	pps. 9; 55-56.	no evidence of involvement
Richard Braitsch	10	pps. 9; 57-59.	no evidence of involvement
Richard Ashbrook	12	pps. 10; 16; 63-65; 80	p, and pg. 64.
Sidney Tawes	13	pps. 9; 16; 28; 64; 65; 66-67.	no evidence of involvement
James Hedges	14	pps. 9; 68-70.	no evidence of involvement
Carl Paschall, Sr.	15, 16	no evidence of involvement	c, j, k, l, m, q, and r.
Thomas Ellis	17	no evidence of involvement	k, q, and r.
Tina Woodland	18	no evidence of involvement	o, and r.
Carl Paschall, Jr.	19	no evidence of involvement	k.
Mark Johnson	20	no evidence of involvement	d, l, p, s, and pg. 64.
Ronald Henderson	21	no evidence of involvement	c, d, l, p, and pg. 64.